Office of the Information and Privacy Commissioner of Alberta

ANNUAL REPORT 2008 - 2009

Promoting a society where personal information is respected and public bodies are open and accountable

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OFFICE OF THE INFORMATION & PRIVACY COMMISSIONER OF ALBERTA

COMMISSIONER'S MESSAGE

It was a busy year. They always are.

Overall the number of cases we opened under all three statutes increased over the previous year. The numbers of cases we closed also increased. The timelines for closing cases through mediation are good. Response times are within acceptable parameters generally.

As good as the numbers look, some of the greatest benefits derived by the people of Alberta from the *Freedom of Information and Protection of Privacy Act* (FOIP), the *Health Information Act* (HIA) and the *Personal Information Protection Act* (PIPA) are not immediately apparent in the statistics. A lot of what we do consists of advising, educating, even chastising public bodies, custodians and other organizations on access, privacy and security issues. We do this through commenting publicly on the things they do; by issuing orders and investigation reports and by working directly with them on certain initiatives. I hope the reader of this annual report will at least glance at some of the case summaries to get a sense of the range of topics this Office is involved in.

I have been asked how I justify taking an adversarial stance with respect to some of the things the public bodies, custodians and organizations do when I am also supposed to be an unbiased adjudicator. The short answer is that the law says I can. In other words, I wear many hats under legislation. The better answer is that a lot of what both public and private bodies do with personal information is complicated. It takes a certain amount of expertise to explain the implications in plain language. We can do this in a lot of cases. By explaining what a new law or policy means, we facilitate discussion and, in a democracy, discussion is always good. Some countries have well-funded public interest groups which can interpret and comment on government initiatives. We have some of these groups in Canada but they are stretched pretty thin in terms of resources. So in that somewhat unique Canadian way, the legislatures have called upon offices like mine to be both a public interest advocate as well as an adjudicator.

So when I comment on an amendment to a law to allow personal information to be shared with other bar owners or the police or when I comment on proposals to put surveillance cameras up on city streets, it is to facilitate discussion and education. Once the measure is passed by our elected bodies, it is time for me to put on my other hat and apply the laws as they are given to me. Public bodies, the Provincial Government in particular, are pretty good about consulting us on access and privacy initiatives. We rely on them to let us know what is happening, and an understanding of our respective roles is important to maintain the exchange of information. Even when the topic under discussion is a hot one, I try to keep my comments and the debate at a respectful level.

I almost always comment on security breaches by organizations. That is, when someone loses a laptop or gets "hacked" or misplaces a file or some paper under their control is found on the street. My motive for doing this is not primarily to embarrass anyone, although that is often an outcome. My motive is to educate others respecting things they need to know, like people lose laptops and therefore they should be encrypted; that whole pieces of paper do get found in the street and therefore should be shredded and criminals do find ways to break into electronic databases.

We publish all the orders we write.

The orders made by myself and the adjudicators are the way in which we interpret the laws, after having listened to the submissions of the parties on the issue. As such they are of value to organizations which are subject to the laws. How valuable they are varies. Some orders show how we think a section of an act should be applied in general. Others merely show how we think a section applies to a specific record or piece of personal information. Admittedly it is sometimes hard to distinguish the more significant from the less.

We are more selective about the investigation results we publish.

Here again we are looking for those which have the greatest educational value. An investigation report is not an order: it is a finding by one of our investigators which is accepted by the parties. Nevertheless such reports can be valuable in terms of understanding how initiatives such as Alberta Netcare work or the circumstances under which a laptop was lost and the implications for the organization. Other times an investigation report might explain why something an organization did was in compliance with the law.

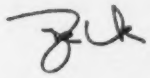
We rarely publish the results of our consultations with organizations unless the organization speaks publicly on the matter and we are asked to comment.

A last word on transparency.

While there is always room for improvement, Government of Alberta performance on access to information requests is good. However, I am concerned about the general degree of transparency shown by the Government of late. That is, I am concerned about the degree to which the Government is routinely communicating with Albertans on provincial matters, outside of specific access to information requests. Power transmission lines, water licences,

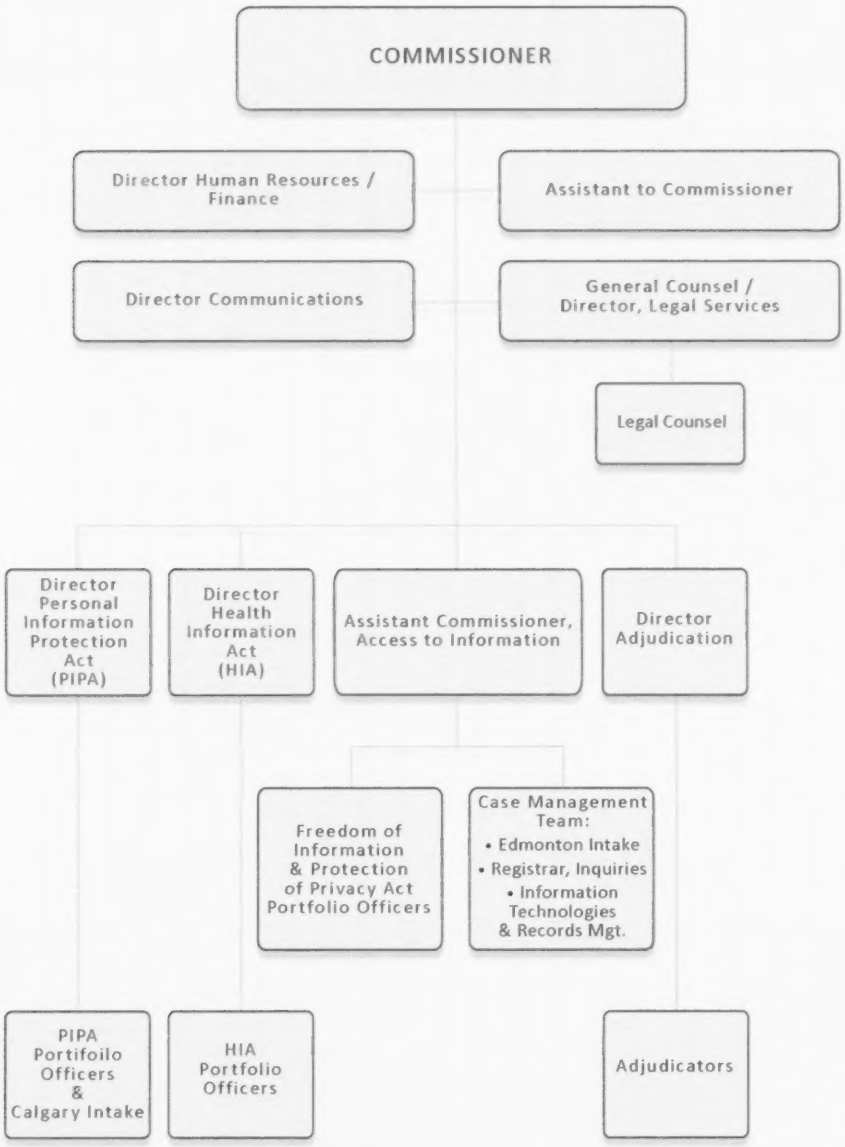
health care costs, health care reorganization, energy royalties, are all matters of concern to Albertans. I think it is incumbent on policy makers to carry on a running dialogue with the public on such matters. Section 32 of FOIP recognizes the need for public bodies to communicate matters of public interest. It is preferable that elected representatives decide what is in the public interest but the section is there to be used.

In a similar vein, I am concerned about the extent to which the government has been introducing Bills which create provisions which are "paramount" to access and privacy laws. This is not new and there has not been a tidal wave of these, but, over time, the cumulative effect of paramountcy provisions is troubling. We oppose paramountcy provisions for several reasons. Records subject to paramount provisions are not available upon a request for access under FOIP. Where the collection, use or disclosure of personal information by a public body is made paramount, privacy complaints about that information cannot be made. I intend to comment on this matter fully in the coming months.

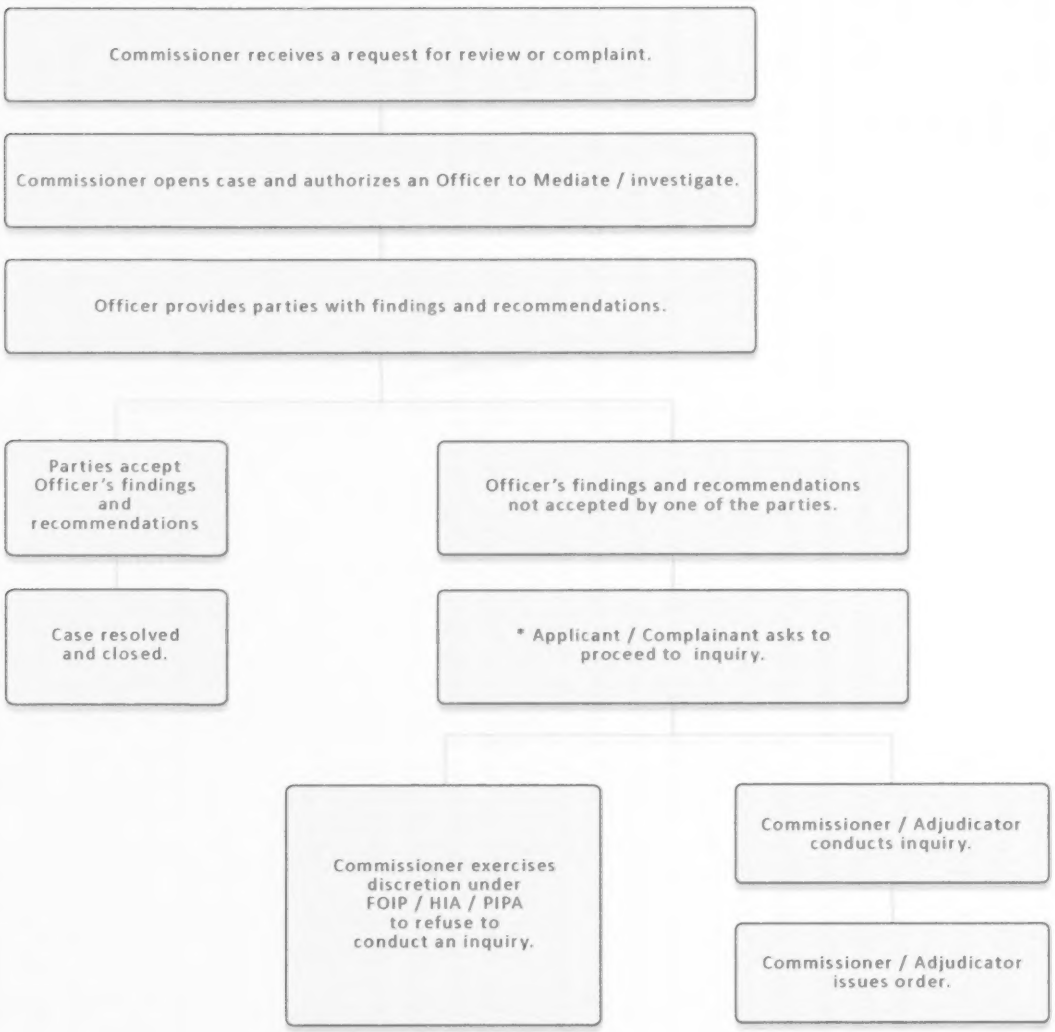


Franklin J. Work Q.C.
Information & Privacy
Commissioner of Alberta

ORGANIZATIONAL STRUCTURE 2008 - 2009


COMMISSIONER
Director Human Resources / Finance
Assistant to Commissioner
Director Communications
General Counsel / Director, Legal Services
Legal Counsel
Director Personal Information Protection Act (PIPA)
Director Health Information Act (HIA)
Assistant Commissioner, Access to Information
Director Adjudication
Freedom of Information & Protection of Privacy Act Portfolio Officers
Case Management Team:
• Edmonton Intake
• Registrar, Inquiries
• Information Technologies & Records Mgt.
PIPA Portifoilo Officers & Calgary Intake
HIA Portfolio Officers
Adjudicators

THE PROCESS: REQUEST FOR REVIEW / COMPLAINT


Commissioner receives a request for review or complaint.
Commissioner opens case and authorizes an Officer to Mediate / investigate.
Officer provides parties with findings and recommendations.
Parties accept Officer's findings and recommendations
Case resolved and closed.
Officer's findings and recommendations not accepted by one of the parties.
* Applicant / Complainant asks to proceed to inquiry.
Commissioner exercises discretion under FOIP / HIA / PIPA to refuse to conduct an inquiry.
Commissioner / Adjudicator conducts inquiry.
Commissioner / Adjudicator issues order.

2008 - 2009 OVERVIEW

Total Cases Opened	1341
Total Cases Closed	1296
Total Orders Issued	47
Total Non-Case Related Calls, emails and written enquiries received	4472

BREAKDOWN of CASES OPENED in 2008 - 2009 by LEGISLATION

	FOIP	HIA	PIPA	TOTAL
Cases Opened	441	564	336	1341

Comments:

- A total of 1341 cases were opened this fiscal year, an increase from the 1123 opened in the previous fiscal year
- Access to information requests account for 56% of cases opened under FOIP
- Privacy impact assessments from custodians represent 66% of cases opened under HIA
- Privacy complaints account for 66% of cases opened under PIPA.
- Number of self-reported breaches have increased this fiscal year:
  - 21 reports under FOIP (compared to 19 last year);
  - 60 reports under HIA (compared to 37 last year);
  - and 27 reports under PIPA (compared to 15 last year).
- Received 42 requests for time extensions under FOIP from public bodies, an increase from the 20 requests received in 2007-2008.
- 62% of the FOIP cases opened and 89% of the PIPA cases opened were initiated by members of the public. 89% of HIA cases opened were initiated by health custodians

BREAKDOWN of CASES CLOSED in 2008 - 2009 by LEGISLATION

	FOIP	HIA	PIPA	TOTAL
Cases Closed	391	646	259	1296

Comments:

- A total of 1296 cases were closed in 2008-2009, an increase from 1066 cases closed in the previous fiscal year.
- Mediation/investigation resolved 91% (or 467) of cases that could have proceeded to inquiry, leaving 44 cases to be resolved by Commissioner's orders.
- Of the 511 cases that were closed through mediation or by Commissioner's orders:

  48% were resolved within 90 days;

  24% were resolved within 90 to 180 days; and

  28% were resolved more than 180 days.

BREAKDOWN on NON-CASE RELATED CALLS, EMAILS & WRITTEN ENQUIRIES

	FOIP	HIA	PIPA	Non-jurisdictional	TOTAL
Non-Case Enquiries	877	538	2912	145	4472

The public (individuals) made 77% of the FOIP non-case calls; 54% of HIA non-case calls and 73% of PIPA non-case calls.

FINANCIAL OVERVIEW

The Standing Committee on Legislative Offices, Legislative Assembly approves the budget of the Office of the Information and Privacy Commissioner. The approved budget for 2008 – 2009 was $5,549,000 for operations and $25,000 for equipment purchases.

Operating Expenses		
Voted Budget	$	5,549,000
Actual Expenses		5,444,489
Unexpended	$	104,511
Equipment Purchases		
Voted Budget	$	25,000
Actual Expenses		5,887
Unexpended	$	19,113

We returned $123,624 (2% of our total budget) to the General Revenue Fund of the Province of Alberta for the 2008 – 2009 fiscal year. This unspent funding is due primarily to vacant positions.

VARIANCE OF THIS YEAR'S TOTAL ACTUAL OPERATING COSTS COMPARED TO BUDGET

Salaries, Wages, and Employee benefits make up about 80% of our operating expenses. We had expenses of $287,919 below budget due primarily to vacant positions created by staff turnover and parental leaves.

Supplies and Services had expenses of $172,428 above budget. This over expenditure was funded by a reallocation from salaries, wages, and employee benefits. The Office had increased legal fees and office expenses associated with more Judicial Reviews. We also had increased printing costs for information kits on access and privacy laws in Alberta which were provided to MLA offices and constituency offices as part of our Right to Know 2008 events.

Salary savings were offset by a net expense of $10,980 for vacation pay, amortization and a recovery from services provided to the Ethics Commissioner.

VARIANCE OF THIS YEAR'S TOTAL ACTUAL OPERATING COSTS TO LAST YEAR'S

Salaries, Wages, and Employee benefits increased from the prior year by $311,416 (8%) which is due primarily to negotiated public service salary increases and increased employer contributions.

Supplies and Services also increased from the prior year by $344,468. This year we had nine decisions on Judicial Review and Appeal, and in the prior year we had three decisions. As a result, we had increased legal fees and office expenses.

The Office sponsored workshops such as the Right to Know forum for Provincial Government FOIP personnel and co-hosted the PIPA Conference in Calgary. We also developed and printed more brochures on access and privacy laws than the previous year. Our website was redesigned and we upgraded our operational case file tracking/management system.

The net increased costs of $659,528 from the prior year also include net increased costs of $3,644 for vacation pay, offset by decreased amortization and support services arrangements with Ethics.

EQUIPMENT PURCHASES

We budgeted $25,000 for information technology purchases, but only purchased one server for $5,887. Other technology projects were deferred to 2009-2010.

FREEDOM OF INFORMATION & PROTECTION OF PRIVACY ACT
FOIP

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COMMISSIONER'S MANDATE UNDER THE FOIP ACT

The *Freedon of Information and Protection of Privacy Act* **(FOIP)** grants individuals a right of access to any record in the custody or under the control of a public body, subject to limited and specific exceptions. **FOIP** also sets out the circumstances under which a public body may collect, use or disclose personal information.

Under **FOIP**, individuals may ask the Commissioner to:

- review any decision, act or failure to act of the head of a public body that relates to their access request;
- review a public body's response to their request for correction of their personal information; or
- investigate a complaint that personal information has been collected, used or disclosed in contravention of **FOIP**.

FOIP also grants third parties a right to ask the Commissioner to review a public body's decision to release their information in response to an applicant's access request.

The Commissioner may initiate investigations on his own motion to ensure that public bodies are in compliance with **FOIP**.

FOIP IN 2008-2009

OVERVIEW

The Commissioner's Office opened 441 cases and closed 391 cases. In addition, the Office received 877 non-case related enquiries.

Members of the Public are Primary Users

62% of FOIP cases were opened in response to requests or complaints from members of the public. The public also accounted for 77% (or 676) of FOIP non-case related enquiries received by the Office.

Access to Information

56% of the cases opened under FOIP are related to access to information requests.

Cases Opened

189 (or 43%) of cases opened were in relation to provincial government bodies (such as ministries, boards and commissions). Educational bodies account for 97 (or 22%) of cases opened. Municipalities and other local government bodies account for 76 cases (or 17%). Remaining cases opened are in relation to law enforcement bodies (8%) and health care bodies (9%).

Requests for Time Extensions

42 requests for time extensions were received in 2008-2009. This is an increase from the 20 requests received in the previous fiscal year.

Of the 42 time extension requests:

- 27 were from provincial government bodies;
- 11 were from educational bodies;
- 2 were from law enforcement bodies;
- 1 from a municipality and 1 from a health care body.

The primary reason cited for the extension requests were large volume of records requested.

The Commissioner granted 35 extensions as requested, 6 extensions were granted for a lesser time period than was requested and 1 request was denied.

Mediation and Investigation

222 (or 57%) of the 391 FOIP cases closed could have proceeded to inquiry (cases such as privacy impact assessments cannot proceed to inquiry). Of the 222 cases that could have proceeded to inquiry, 190 (or 86%) were resolved through the mediation/ investigation process, leaving 32 cases to be resolved by Commissioner's Orders.

Consultation to Public Bodies
The Commissioner and his Office continues to provide consultation to public bodies on program initiatives and policy matters in relation to access and privacy matters. In addition, the Office reviewed and provided comments on a number of proposed amendments and new legislation.

RIGHT TO KNOW WEEK 2008

Right to Know Week is a world-wide annual event that promotes global awareness of individuals' right to access information as part of public accountability and transparency.

On October 2, 2008, the Commissioner hosted a forum for provincial government FOIP personnel. 86 participants attended this first-time event and feedback from participants was extremely positive.

The Office also developed and sent an information kit to legislative offices and constituency offices of all MLAs regarding access and privacy laws in Alberta. The information kits provide a practical reference source for staff at the MLAs offices as they are often the front-line contacts to the public.

REVIEWS AND COMPLAINTS ON THE COMMISSIONER'S OFFICE

The Commissioner's Office received 2 requests for access to information under FOIP in 2008-2009. Both applicants were informed that the records requested would not be disclosed as the records were excluded from the application of FOIP under section 4(1)(d). One of the applicants subsequently requested a review under section 77(2) of the Commissioner's response to the applicant's access request. An adjudicator has been appointed under section 75 of FOIP to review this matter. The review is currently in progress and no decision has been issued at this time.

On January 30, 2009, an adjudicator appointed under section 75 of FOIP issued a decision in relation to a privacy complaint filed against the Commissioner (Adjudication Order #6). The complainant alleged the Commissioner disclosed his personal information in contravention of FOIP when the Commissioner copied a letter to three named individuals. The adjudicator determined that the letter was not excluded from the application of the FOIP under section 4(1)(d). The adjudicator's decision is currently under judicial review.

REQUESTS FOR MEDICAL RECORDS

As noted in last year's annual report, the Commissioner's Office secured boxes of medical records that were abandoned to protect the information from unauthorized access, collection, use and destruction. During this fiscal year, our Office received and responded to 17 requests in relation to these records.

HEALTH INFORMATION ACT
HIA

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HEALTH INFORMATION ACT (HIA)

The *Health Information Act* (HIA) applies to health information in the custody or control of custodians. A custodian includes Alberta Health and Wellness, regional health authorities, health boards, health services providers and pharmacies and pharmacists.

The Commissioner is mandated under the HIA to review:

- Any decision made by a custodian in relation to an individual's request to access their health information, or to correct or amend their health information
- An individual's complaint that their health information has been collected, used or disclosed in contravention of the HIA

The HIA also sets out the duties and obligations of a custodian to protect health information. A key provision of the HIA that helps ensure custodians assess risks to privacy is the duty to submit a privacy impact assessment (PIA) to the Commissioner for review and comment. A custodian must submit a PIA to the Commissioner before implementing any new practice or information system or making changes to an existing practice or system.

PRIVACY IMPACT ASSESSMENTS

There was a significant increase in PIA's submitted to the Commissioner this year. Custodians submitted 374 PIA's compared to 270 in the previous year. While there was an increase in PIA submission from custodians, the most significant area of increase was in the pharmacy sector.

SELF REPORTED BREACHES

Custodians have been encouraged to report breaches of privacy to the Commissioner. The number of breaches reported increased from 37 last year to 60 this year. We believe this increase represents greater compliance with our request to custodians that they tell us about breaches, rather than an actual increase in the number of breaches.

We work with custodians to ensure a breach is reasonably addressed and proper consideration is given to notifying individuals who may be impacted by the breach. It is our practice to not comment publicly on these breaches. However, the Commissioner may comment publicly in instances where the breach becomes publicly known or where an investigation commences due to an affected individual filing a complaint with the Commissioner.

INVESTIGATION REPORTS

INVESTIGATION REPORT H2008-IR-001

An individual complained that her pharmacist was required to provide her health information to Alberta Health and Wellness for inclusion in Alberta Netcare without her consent and in contravention of her expressed wishes.

The investigator found that consent is not required for health information to be made available through Alberta Netcare but that the ability to make information available is balanced by the requirement placed on custodians to consider an individual's expressed wish related to the amount of health information that is disclosed. The investigator in this case found that the Complainant had made her wishes related to limited disclosure known to her pharmacist and to Alberta Health and Wellness. She found that the pharmacist was precluded from withholding health information from AHW as disclosure was required under the Health Information Regulation. She also found that AHW, as a custodian of the health information it collects from pharmacists, is required to consider the expressed wishes of individuals related to the disclosure of information through Netcare.

The investigator ultimately found that AHW failed to consider the individual's expressed wishes and, therefore, contravened the HIA. The investigator based this finding on the Department's failure to adequately implement the technological solution in Netcare that would allow for health information to be restricted from disclosure, or "masked". A number of recommendations were made to the Department on the closing of this file, including the recommendation that the Department take immediate steps to fully implement masking in Netcare and enhance their efforts to communicate the privacy features in Netcare to end-users and Albertans.

INVESTIGATION REPORT
H2008-IR-002

A physician closed his practice and made arrangements with a data storage company in Ontario to store his patient records and make them available on request from former patients. An individual asked for a copy of his records and received his records, plus those of three other individuals. The physician had asked his electronic medical record (EMR) vendor to convert and send data from his EMR to the data storage company. This conversion introduced errors into the files. The storage company then provided health information to former patients, but did not check files before sending them.

The Investigator found that the physician had taken measures to ensure the accuracy of data before asking his EMR vendor to perform the conversion, but that both the EMR vendor and the data storage company had failed to do so. While the physician's two service providers failed to meet their duties under the information manager provisions of the HIA, the physician, as a custodian under the Act, was ultimately responsible for the erroneous disclosure of health information and apologized to those affected. Both information managers amended their practices following the investigation.

INVESTIGATION REPORT
H2008-IR-003

East Central Health voluntarily reported the theft of a laptop containing identifiable health information to the Commissioner.

The OIPC uses the following criteria to assess whether or not reasonable steps have been taken to secure health information when it is stored on mobile communication devices:

1. Custodians must assess the privacy and security risks associated with the use of mobile devices and should limit the use of these devices to circumstances where mobility/portability is required (i.e. cannot be achieved through any other means).

2. Health information that is stored on a mobile device must be protected by properly implemented encryption.

3. Custodians must take reasonable steps to physically secure mobile devices, even when encrypted.

4. Custodians that store health information on mobile devices must implement policies and procedures that users are aware of and educated on that guide the proper use of the device.

The investigation stemming from ECH's self-reported breach determined that ECH had fulfilled each of these criteria, including fully encrypting the hard drives, developing policies and procedures and conducting a privacy impact assessment prior to storing health information on the mobile device. The effective use of encryption in this case reduced the risk that the patients would be identified to such a low level that ECH was not required to notify the affected individuals that their health information had been lost.

INVESTIGATION REPORT
H2009-IR-001 & P2009-IR-001

An individual complained that her private physician gave her entire medical chart to her employer (a local hospital and also a custodian under the HIA) for the purpose of responding to an insurance company's request to the physician for information about a non-work related accident.

The physician and hospital strongly asserted their position that the records of the physician belonged to the hospital by virtue of their 1996 purchase of the records of the physicians who previously owned that clinic. It was their opinion that the hospital was the custodian of any records generated by the physician in his private practice. This position was not supported by the investigator, who found that the physician was the accountable custodian of records that relate to the provision of health services for which he billed the Alberta Health Care Insurance Plan, and that that accountability cannot be transferred under the HIA. Once control of the patient's records had been established, the investigator found that the physician contravened the HIA when he provided the entire patient chart to the employer and that the employer had no authority to collect the Complainant's chart.

The Complainant also raised concerns about the amount of information that had been provided to an insurance company to assess her claim for disability benefits. The investigator found that the Complainant consented to the insurance company collecting personal information when she initiated a claim for disability benefits. The investigator also found that the insurance company sufficiently limited the collection of personal information to that which was reasonable to adjudicate the claim made by the Complainant.

The investigator recommended that the physician and hospital create a plan for the management of the physician's records that clearly aligns responsibility and custodianship with the HIA and submit it to the investigator for review and comment.

INVESTIGATION REPORT
H2009-IR-002

An individual had been involved in a car accident while visiting Montana and decided to take legal action. The opposing party obtained a subpoena from a Montana court to have the individual's health information released. The physician responded to this order, providing a sworn statement and a copy of the individual's medical chart. The individual complained that his physician had disclosed his personal information in response to a court order issued by a foreign court. Under the HIA, custodians may only respond to court orders issued by courts with jurisdiction in Alberta or Canada.

The investigation revealed that the court order had not been recognized by a court with jurisdiction in Alberta or Canada. Therefore the investigator found that the physician, by responding directly to the court order from Montana, had contravened the HIA. The investigator noted there is a process under the Alberta Rules of Evidence to have foreign court orders recognized in Alberta, but it had not been followed in this case.

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PIPA

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PERSONAL INFORMATION PROTECTION ACT (PIPA)

The *Personal Information Protection Act* (PIPA) applies to provincially-regulated private sector organizations operating in Alberta. The Act provides rules respecting the collection, use and disclosure of personal information – defined in the Act as "information about an identifiable individual." PIPA seeks to balance the right of an individual to have his or her personal information protected, with the need of organizations to collect, use or disclose personal information for reasonable purposes.

In fiscal year 2008-2009, a total of 336 new PIPA cases were opened. This represents an increase of 13% over the previous fiscal year. Sixty-six percent (66%) of these new cases were privacy complaints, concerning issues such as collection, use, and disclosure of personal information, and safeguarding. Twenty-three percent (23%) of new cases were requests for the Commissioner to review organizations' responses to an individual's request to access his or her own personal information.

Twenty-seven (27) new cases were opened when organizations self-reported privacy breaches. This represents an increase of 80% over the previous year (15 breaches were self-reported in 2007-2008). The OIPC started to receive and track self-reported breaches in mid-2005. The top causes of such incidents have been:

- Break-in/theft (including stolen laptops),
- Mailing error (personal information sent to the wrong address or wrong person, or personal information included on mailing address),
- Personal information goes missing during courier or mailing transmission,
- Former employee misuse of personal information.

Only one case was opened on the Commissioner's own motion this year, compared to fifteen (15) in the previous fiscal year.

For the first time, the majority of new cases (16%) came from the "other services" sector – which includes unions, professional regulatory organizations, condominium corporations, and religious organizations. This was followed by the retail sector, which saw 12% of new cases. The Office continued to see a significant number of complaints related to the collection (recording) and retention of driver's license numbers, as well as complaints respecting collection, use and disclosure of personal employee information, including medical information.

This year also saw a significant (19%) increase in the number of telephone, email and written enquiries. PIPA staff responded to 2,912 such enquiries from individuals and organizations.

A total of 259 cases were closed in 2008-2009. Of these, 251 were resolved through mediation and/or investigation. Eighteen (18) cases were sent to inquiry.

INVESTIGATION REPORTS

Three (3) PIPA Investigation Reports were published during fiscal year 2008-2009, and are summarized below.

EMPLOYER AND CONTRACTED SERVICE PROVIDER FOUND IN CONTRAVENTION OF PIPA (P2008-IR-003, APRIL 2008)

The complainant, an employee of TransAlta Corporation (TransAlta), obtained a medical note advising his employer that he required a three-month leave from work. He provided the note to TransAlta's contracted occupational health services (OHS) provider, KLA, and was subsequently referred to an Employee and Family Assistance Program (EFAP) for treatment and counseling (which services were also provided by KLA under contract to TransAlta). The complainant believed that services provided by KLA EFAP would be confidential from KLA OHS and TransAlta management. Upon learning that some of his personal information had been shared between KLA EFAP, KLA OHS and TransAlta, he submitted a complaint alleging this was done in contravention of PIPA, and without his consent.

The Investigator found that much of the information qualified as personal employee information under PIPA. However, as the complainant was not clearly notified of the purposes for which his information would be used, consent was required. As consent was not obtained, KLA EFAP and KLA OHS were found to have contravened PIPA.

TransAlta was also found to have contravened PIPA by collecting more information than was reasonable for its purposes, including information that revealed the nature of the complainant's treatment and that he had been attending at KLA EFAP. In addition, TransAlta contravened PIPA by copying a letter containing the complainant's personal information to his direct and indirect supervisors and others within the organization. The Investigator found that it would have been more reasonable to report limited information directly to each of the recipients, considering the specific purpose for doing so in each case.

INSURANCE COMPANY'S PRACTICES FOUND TO BE IN COMPLIANCE WITH PRIVACY LEGISLATION (P2008-IR-004, AUGUST 2008)

The complainant applied for a life insurance policy offered by Canada Life Assurance Company (Canada Life) through Investors Group. The Complainant was approved for insurance by Canada Life, but became concerned when the Investors Group Financial Advisor delivered the insurance documents to her. The documents included her insurance contract, policy and application, but also the paramedical examination results completed by a health practitioner for the purposes of the application.

In addition, a health questionnaire that the Complainant completed was amongst the documents. The Complainant believed that Canada Life's inclusion of this

sensitive personal information in the contract documents presented to her by the Investors Group Financial Advisor was not reasonable. She maintained that the Investors Group Financial Advisor had no reason to access the information.

The investigator found that Investors Group was a contracted service provider of Canada Life and was authorized to carry out specific duties on Canada Life's behalf, including reviewing medical information contained in policy documents with customers and policy delivery. The Financial Advisor was licensed and trained to provide this service and appointed to carry out these activities.

Although the investigator determined that Canada Life's practices were in compliance with PIPA, it was recommended that Canada Life take action to ensure that Investors Group is better able to identify customer concerns about privacy and make alternative arrangements for the direct delivery of medical documents to customers. Canada Life agreed to take this action, and the Complainant was satisfied.

BIOMETRIC SIGN-IN SYSTEM PASSES SCRUTINY OF THE OFFICE OF THE INFORMATION & PRIVACY COMMISSIONER (P2008-IR-005, AUGUST 2008)

An employee of Empire Ballroom, a nightclub in Edmonton, complained that the organization was implementing a thumbprint system to track employee shift arrival and departure times. She complained that she wasn't given proper notice of the system and felt the use of biometrics was highly intrusive. She also claimed her employment was terminated as a result of her refusal to provide a thumbprint scan.

The investigation concluded that the biometric system was not an invasion of privacy because the actual thumbprint was not scanned. Instead, the system collected a measurement of the employee's print, and then generated and recorded a unique identification number. The number was then used to document an employee's sign-in and sign-out times.

Because no actual thumbprints were being collected, use of the biometric technology was found to be compliant with PIPA. However, the investigator recommended that Empire Ballroom provide better notice and explanation about the use of technology to employees.

The investigator was unable to determine if the complainant's employment was terminated because of her refusal to participate in the new system.

CASE SUMMARIES

The OIPC published 5 PIPA case summaries in fiscal year 2008-2009. Case summaries are posted on the OIPC website when they have educational value for other organizations.

NON-PROFIT ORGANIZATION DISCLOSES SCHOLARSHIP RECIPIENT'S PERSONAL INFORMATION IN NEWSLETTER (P2008-CS-001, JULY 2008)

The Complainant, a recipient of The Alberta New Home Warranty Program's (ANHWP) Scholarship Award in the Construction Engineering Technology Program at the Northern Alberta Institute of Technology, submitted a thank-you letter to ANHWP to show consideration and appreciation for the award. ANHWP reproduced the letter in its quarterly newsletter, distributed to approximately 2,300 builder members. The Complainant complained that ANHWP disclosed his personal information without consent.

ANHWP stated that it obtained the Complainant's consent to publish his name and photograph, and the fact that he had received a scholarship from ANHWP. However, ANHWP did not specifically obtain consent to reproduce the letter in its newsletter and mistakenly assumed they had consent to do so.

The investigator found that ANHWP is registered under Part 9 of the Companies Act and so qualifies as a non-profit organization under section 56 of PIPA. As a non-profit, the provisions of PIPA apply only when ANHWP collects, uses or discloses personal information in connection with a commercial activity. In this case, ANHWP's disclosure of the Complainant's personal information in its newsletter was not connected to a commercial activity, and so PIPA did not apply.

Notwithstanding the investigator's findings, ANHWP committed to develop and implement privacy policies and procedures regarding publication of its newsletter - including obtaining written consent for the collection, use and disclosure of personal information in any ANHWP publications. In addition, ANHWP advised that, of 2,300 copies of the newsletter which were produced, approximately 1,300 were collected and destroyed.

NON-PROFIT ORGANIZATION DISCLOSES PERSONAL INFORMATION WITHOUT CONSENT (P2009-CS-001, JANUARY 2009)

The Complainant alleged that Fairways Villas South Homeowners' Association (the Association) disclosed Members' personal information, including names, home telephone numbers and email addresses, postal codes and property purchase dates, without consent, in its Homeowner List, distributed to all Association Members. In addition, the Complainant was concerned with information published in the Association's newsletter, "...[including] medical diagnoses, the named infirmaries

and addresses and phone numbers where ill people lived and could be reached", as well as property assessment information obtained from a City of Calgary website.

The investigator found that the Association is a non-profit organization registered under Part 9 of the Companies Act, and qualifies as a non-profit organization for purposes of PIPA (section 56(1)(b)(i)). As such, PIPA applies in respect of personal information collected, used or disclosed in connection with any commercial activity carried out by the Association (section 56(3)).

The Association was engaged in a commercial activity when it provided property maintenance services to Members in exchange for a monthly fee. Personal information included in the Association's Homeowner List was found to have been collected in connection with providing these services; therefore, PIPA applies to the Association's collection, use and disclosure of this personal information. Section 7 of PIPA generally requires that organizations obtain consent to collect, use and disclose personal information. The Association did not obtain consent to disclose residents' personal information in its Homeowner List, believing that its By-Laws authorized disclosure without consent. The investigator found that this was not an exception to the requirement under PIPA to obtain consent, nor did any of the other exceptions to consent set out in section 20 of PIPA authorize the disclosure. As such, the Association contravened section 7(d) of PIPA.

The investigator also found that personal information published in the Association's newsletter ("including medical diagnoses, the named infirmaries and addresses and phone numbers where ill people lived and could be reached") was not collected, used or disclosed in connection with a commercial activity. As such, the provisions of PIPA do not apply to the personal information included in the newsletter.

COMMUNITY COLLEGE COLLECTED AND USED PERSONAL INFORMATION BEYOND REASONABLE EXTENT (P2009-CS-002, JANUARY 2009)

After completing the admission requirements for a program at Columbia College (Columbia), the Complainant provided Columbia with a copy of a psychologist's report (the Report) in order that Columbia could implement accommodations for his learning needs. The Report included a narrative description of interviews between the Complainant and the psychologist, test results and discussion of diagnostic information, as well as the psychologist's recommendations for accommodation. The Complainant was concerned when he later learned that the entire Report was provided to the Program Instructor (who was also the Program Manager) and another Columbia employee.

Columbia stated that personal information included in the Report was used to ensure Columbia had a full understanding of the Complainant's accommodation needs.

Columbia also believed it had the Complainant's consent to collect and use all personal information in the Report, as he had signed a form consenting to the sharing of information for the purpose of admissions screening, and because the Report was voluntarily provided by the Complainant to Columbia.

The investigator found that Columbia contravened sections 11(2) and 16(2) of PIPA by collecting and using the Complainant's detailed medical information beyond an extent that was reasonable for the organization's stated purpose. The only personal information reasonably required to implement accommodations for the Complainant's learning needs was the part of the Report summarizing the psychologist's recommendations. If more information was subsequently required, Columbia could have requested clarification of the recommendations. The investigator found this situation to be analogous to an employer/employee relationship; previous OIPC findings have found that employers should generally collect only basic fitness for work information and information required to make accommodations (see Investigation Reports P2008-IR-003 and P2007-IR-001). It is not generally reasonable for employers to collect detailed medical information or diagnoses, and it was not reasonable for Columbia to do so in this case.

The investigator also found that Columbia contravened sections 7(1)(a) and 7(1)(c) of PIPA. The form signed by the Complainant did not authorize Columbia to collect personal information for the purpose of implementing accommodations, but instead was consent for admissions screening.

INSURANCE COMPANY CHANGES ITS PRACTICES WITH RESPECT TO USE OF PERSONAL INFORMATION COLLECTED THROUGH ITS ONLINE INSURANCE QUOTE SYSTEM (P2009-CS-003, APRIL 2009)

The Complainant alleged that Johnson Inc. (Johnson) used his personal information to mail him offers to quote on his insurance needs. He did not wish to receive any further offers and wanted to know how Johnson had acquired his personal information (name, contact information, insurance policy expiry dates and the fact of his credit union membership) to use to mail him solicitations. He attempted to contact Johnson to resolve the matter, but did not receive a response.

The investigator found that Johnson initially acquired the personal information at issue when the Complainant accessed Johnson's online quote system in 2004. At that time, there was a link from the online quote screen to Johnson's privacy policy which advised potential customers that their personal information might be used to contact them to offer "other available, related insurance products". The investigator found that the Complainant voluntarily provided information for the obvious purposes of an initial insurance quote, and that the information collected by Johnson was reasonable in extent for this purpose. However, the link to Johnson's privacy policy did not constitute adequate notice of Johnson's intention to use personal information for marketing mailings. Further, Johnson did not obtain the complainant's consent to use his personal information to contact him to offer other insurance products, and

therefore contravened section 7(1)(c) of PIPA when it used his personal information for this purpose.

Since 2004, Johnson has revised its practices to always seek consent from individuals to use their personal information for marketing purposes. This is achieved through specific telephone scripting at first contact, at which time individuals are asked to specifically consent to future contact.

ORGANIZATION AUTHORIZED TO DISCLOSE PERSONAL INFORMATION TO POLICE WITHOUT CONSENT (P2009-CS-004, JANUARY 2009)

The Complainant suspected there was a problem with his power meter. FortisAlberta Inc. (FortisAlberta) indicated there was no defect with the meter and that the Complainant's consumption was accurately reflected on his billing statement. The Complainant revealed to FortisAlberta that he is a medical marijuana user and grower, as approved by Health Canada. The Complainant alleged that police later attended his home and advised that FortisAlberta had reported his marijuana growing to police. The Complainant alleged FortisAlberta was not authorized to disclose this information to police.

Fortis Alberta stated that a power line technician (PLT) examined the Complainant's meter, but determined it was reading properly. The PLT assumed that the Complainant was disputing the large increase in his electricity bill and, as a result, enquired about the Complainant's consumption. The Complainant revealed he grew marijuana in his home for medical purposes and was legally authorized to do so by Health Canada. Despite the explanation, the PLT remained concerned about the legality of the grow operation and reported his concerns to police.

The investigator found that FortisAlberta's disclosure was made to police "to assist in an investigation" related to a contravention of an enactment of Canada where there was a belief that the "conduct in question...may have occurred." There was reason to believe that an offense may have occurred in this case, and that police would investigate this information with a view to engaging in a law enforcement proceeding. The investigator found that this met the definition of "investigation" under section 1(f) of PIPA and the requirements of section 20(f) of PIPA. Therefore, FortisAlberta was authorized by section 20(f) of PIPA to disclose information about the Complainant to police without consent.

Section 19(1) of PIPA requires that where personal information is disclosed, it is done for "purposes that are reasonable." Reporting of suspected criminal activity to police is generally considered reasonable given that PIPA does not require consent for such disclosures. The investigator considered that FortisAlberta had no means to confirm the Complainant's assertion that his grow operation was legal. The disclosure was made in good faith and based on the Complainant's own admission that he grows marijuana, something generally understood to be illegal. FortisAlberta did reveal to police the Complainant's assertion that his activity was authorized by Health Canada, but believed police should confirm the information.

OTHER ACTIVITIES

COOPERATION AND CONSULTATION BETWEEN PRIVATE SECTOR PRIVACY REGULATORS

Fiscal year 2008-2009 saw continued efforts between the Alberta OIPC and other private sector privacy regulators to work together to collaborate on policy, enforcement and public education.

Towards the end of 2008, the Privacy Commissioner of Canada, and the Information and Privacy Commissioners of Alberta and British Columbia signed a Memorandum of Understanding committing to achieving these goals. The Memorandum of Understanding is available on the Alberta OIPC website at **www.OIPC.ab.ca**.

As an example of this collaborative work, in December 2008, the three offices jointly published a document entitled Collection of Driver's Licence Numbers under Private Sector Privacy Legislation: A Guide for Retailers. Acknowledging the significant number of complaints the Alberta OIPC has received over the past two years related to the collection and recording of driver's license numbers by organizations, the Guide for Retailers aims to assist organizations in understanding the privacy implications of these practices.

Retailers collect driver's license information for a number of reasons, including to verify the identity of someone using a credit card or picking up merchandise that has already been paid for. Many also use driver's license numbers to deter and detect fraud, particularly when merchandise is being returned without a receipt.

The Guide for Retailers, however, notes that a driver's license number is a particularly sensitive piece of information which can be valuable to identity thieves, and advises retailers to limit the collection of personal information to the least amount needed to achieve a specific purpose – such as confirming a customer's identity. Organizations must be able to explain to customers why they are collecting the information. They are also required to protect it with appropriate security measures.

The new guidelines explain that many business purposes can be satisfied by simply looking at identification, or, at most, recording the name and address appearing on the license. The guidelines also explain that there is a difference between examining a driver's license and recording the number on it – or even photocopying the whole document. Recording this kind of sensitive information raises the risk of a privacy breach down the road, while a photocopy involves the collection of information well beyond a name and address, including a photo, signature and physical descriptions.

The Guide for Retailers is available on the Alberta OIPC website at **www.OIPC.ab.ca**.

The Alberta OIPC also collaborated with colleagues in British Columbia, Quebec, and the federal Privacy Commissioner's Office to produce Captured on Camera: Streetlevel Imaging Technology, the Internet and You.

This document recognizes that a number of companies have begun collecting images of public places in Canada, which may then be made available over the Internet or through other means. In Canada, however, private-sector privacy legislation applies to these streetlevel imaging applications if they are collecting images of identifiable people. The document informs both individuals and organizations of some of the privacy issues associated with these applications.

PIPA CONFERENCE 2008

In November 2008, the annual PIPA Conference returned to Calgary after being held in Vancouver in 2007. Over 200 registrants from businesses, non-profit organizations, government, and law firms attended the Conference, which was co-hosted again by the Offices of the Information and Privacy Commissioner of Alberta and British Columbia. The 2008 Conference theme was "Managing Privacy from the Inside Out," and included a number of very popular sessions, including the Bear Pit with the Commissioners, and key note speaker Dan Gardner, a journalist with the Ottawa Citizen and the author of Risk, The Science and Politics of Fear. Registrants were also able to attend sessions that focused on privacy issues associated with biometrics in the workplace, collecting personal information from social networking sites, online behavioral monitoring, payroll and recruitment, and how to recognize and address threats to privacy that originate within an organization.

In conjunction with the Conference's return to Alberta, the Alberta OIPC sponsored a contest open to high school and post secondary students, entitled "Look @ Me! The Privacy Project". The purpose of the contest was to find out what young people in Alberta think about privacy and their personal information. A number of video and print submissions were received; the winning video entries are available on the OIPC website at **www.OIPC.ab.ca**.

ORDERS 33

ORDERS

IN THE COURSE OF REVIEWING THE EDMONTON POLICE COMMISSION'S RESPONSE TO AN ACCESS REQUEST, THE COMMISSIONER SET OUT A LIST OF POINTS ON WHICH A PUBLIC BODY SHOULD SUPPLY EVIDENCE IN ORDER TO SHOW IT CONDUCTED AN ADEQUATE SEARCH
ORDER F2007-029 (JUNE, 2008)

On reviewing the Edmonton Police Commission's response to an access request, the Commissioner determined that the Commission had failed to meet its duty to assist to assist the applicant, by failing to inform the Applicant of all responsive records in its custody or under its control, and the provisions of the *Freedom of Information and Protection of Privacy Act* (FOIP) on which it had relied to withhold information. He noted that a public body should supply evidence on the following points to establish that it conducted an adequate search for responsive records:

- The specific steps taken by the Public Body to identify and locate records responsive to the Applicant's access request
- The scope of the search conducted – for example: physical sites, program areas, specific databases, off-site storage areas, etc.
- The steps taken to identify and locate all possible repositories of records relevant to the access request: keyword searches, records retention and disposition schedules, etc.
- Who did the search
- Why the Public Body believes no more responsive records exist than what has been found or produced

AN ADJUDICATOR DEFINED THE TERM "STATISTICAL SURVEY" UNDER SECTION 24(2) OF THE FIOP ACT, AND RULED THAT SUCH INFORMATION COULD NOT BE WITHHELD
ORDER F2008-008 (JUNE 2008)

Alberta Employment and Immigration withheld the questions and results of a public opinion survey on employment standards under section 24(1) of the FOIP Act, on the basis that the information was advice, etc. Noting that section 24(2) sets out specific kinds of information that cannot be withheld under section 24(1), the Adjudicator concluded that most of the questions and results of the survey were improperly withheld, as the information was part of a "statistical survey" (which he defined as "a collection, interpretation and presentation of numerical data relating to the study of a topic, issue, situation or program"), and thus fell under section 24(2)(d). The records could therefore not be withheld under section 24(1). The Adjudicator also found that the non-numerical information (i.e., substantive comments) did not constitute advice that could be withheld, as the members of the general public who responded to the survey were not engaged in an advisory role, but had simply been asked to provide general feedback.

THE COMMISSIONER ORDERED TWO DEPARTMENTS - ALBERTA EMPLOYMENT AND IMMIGRATION AND ALBERTA FINANCE AND ENTERPRISE - TO DISCLOSE INFORMATION REGARDING THE USE OF A GOVERNMENT CREDIT CARD BY A FORMER EMPLOYEE
ORDERS F2008-014 & F2008-015 (JULY, 2008)
An Applicant made a request under the FOIP Act to two departments for information regarding personal expense records of a third party generated while using a government credit card, and correspondence between several named government ministers and employees regarding this matter. The departments had withheld most of the information on the basis that the records were non-responsive, or that section 17 (disclosure would unreasonably invade personal privacy) applied. The Commissioner held that some of the information withheld as non-responsive was responsive to the request, while some was not. He also held that the departments had not properly applied section 17 of the Act in withholding certain parts of the information. The Commissioner ordered disclosure of those parts of the information for which he determined the need for public scrutiny outweighed personal privacy conciderations.

AN ADJUDICATOR RULED THAT A FURNITURE STORE CONTRAVENED THE PERSONAL INFORMATION PROTECTION ACT WHEN IT RECORDED AN INDIVIDUAL'S DRIVER'S LICENSE NUMBER AND CAR LICENSE PLATE NUMBER BEFORE SHE COULD PICK UP MERCHANDISE THAT HAD BEEN PAID FOR EARLIER
ORDER P2008-004 (AUGUST, 2008)
A furniture store required the Complainant to supply her driver's license number and license plate number before she would be allowed to pick up the merchandise. The Organization stated that its purpose was to prevent fraud and theft, and to assist the customer and police in situations were someone had fraudulently picked up merchandise.

The Adjudicator found that the information collected was personal information, and that the Organization's purpose of preventing fraud was reasonable. However while looking at a driver's license or other identification document to check identity was permissible, recording drivers' license numbers and license plate numbers was not reasonably connected to preventing fraud or assisting police, as it would not (for reasons explained in the order) help to achieve these goals. The Adjudicator ordered the Organization to stop recording drivers' license numbers and license plate numbers for merchandise pick-ups, and to destroy such information that it had already collected.

This decision was upheld on judicial review.

AN ADJUDICATOR ORDERED CARITAS HEALTH GROUP TO DISCLOSE RECORDS TO THE APPLICANT.
ORDERS F2008-012, H2008-003 (OCTOBER, 2008)
A health services provider requested his personal information from his employer, who is both a custodian under the *Health Information Act* (HIA), and a public body under the FOIP Act. A preliminary issue was whether HIA or the FOIP Act applied to the request. The Adjudicator determined that "health service provider" information is not "health information" under HIA, unless it forms part of a patient's health information. Otherwise, the definition of "health information" in HIA would be artificial, in the sense that it would include stand-alone information about health service providers, which is not health information as that term is generally understood. Thus the FOIP Act applied to the access request.

The Adjudicator also determined that the Applicant was entitled to access to records containing his personal information, even though the records also contained the personal information of other individuals. She found that the factors weighing in favour of disclosure outweighed the factors against disclosure.

This decision was upheld on judicial review.

AN ADJUDICATOR ORDERED THE COUNTY OF VERMILION TO DISCLOSE INFORMATION FROM A SETTLEMENT AGREEMENT AND THE TOTAL LINES FROM LEGAL BILLS TO THE APPLICANT. ORDER F2007-025 (NOVEMBER, 2008)

The Adjudicator considered clauses 17(2)(e) and 17(2)(h) of section 17 of the FOIP Act (disclosure harmful to personal privacy). Section 17(2) contemplates situations when it is not an unreasonable invasion of personal privacy to disclose personal information. The Adjudicator determined that clause (e) applies to discretionary benefits provided to employees in their capacity as employees, while clause (h) applies to personal information that is the details of financial benefit conferred by the Government of Alberta at its discretion and can apply to amounts paid to settle a lawsuit. This order marked a departure from past orders, which had held that section 17(2)(e) applied to all benefits flowing from the employment relationship.

This order also considered the application of the decision of the Supreme Court of Canada in *Maranda v. Richer* [2003] 3. S.C.R. 193 to access requests for lawyers' bills of account. The Adjudicator applied the following test to determine whether solicitor-client privilege applies to information in a bill of account: Is there a reasonable possibility that the assiduous inquirer, aware of background information available to the public, could use the information requested concerning the amount of fees paid to deduce or otherwise acquire communications protected by the privilege? The Adjudicator determined that information that did not reveal privileged communications could be severed from the bills of account.

AN ADJUDICATOR ORDERED THE CITY OF CALGARY TO RELEASE INFORMATION FROM A VALUATION REPORT RELATING TO THE CALGARY AIRPORT. ORDER F2008-011 (JANUARY, 2009)

This order marks the first time that section 24(2)(g) of the FOIP Act, one of the provisions that sets out specific kinds of information that cannot be withheld under section 24(1), has been considered in an order. The Adjudicator stated that the intent of this provision is to ensure transparency and accountability in the manner by which public bodies perform their statutory functions and duties, which may involve making decisions affecting the rights of citizens under legislation. She determined that for the purposes of section 24(2)(g), a "substantive rule" within the terms of the section is a significant principle to which actions or procedures of a public body conform or adhere when it interprets its statute or administers its programs or activities.

The Adjudicator decided that information that had been severed by the Public Body from a valuation report relating to the Calgary Airport had become a substantive rule or statement of policy by which the Public Body interpreted its taxation powers and administered its activities under the *Municipal Government Act*. As such, the information fell under section 24(2)(g). Therefore section 24(1), which permits withholding of advice, etc., did not apply.

She ordered the Public Body to disclose the records in their entirety to the Applicant.

AN ADJUDICATOR RULED THAT A UNION'S VIDEO RECORDING OF PERSONS CROSSING A PICKET LINE WAS AUTHORIZED ONLY FOR THE LIMITED PURPOSE OF DOCUMENTING EVIDENCE THAT COULD BE USED IN AN INVESTIGATION OR LEGAL PROCEEDING RELATING TO THE PICKETING ORDER P2008-008 (MARCH, 2009)

A union video recorded people entering or leaving a casino whose premises it was picketing. The Adjudicator held that the *Personal Information Protection Act* (PIPA) authorized this activity to the extent that it was done for the purpose of a possible investigation or legal proceeding that might arise from incidents relating to the picketing.

However, the Union also had other purposes for collecting the video recordings, and for using and disclosing still images and photographs, for example, posting them on the Union's www.CasinoScabs.com website, and in the Union's newsletters. The Adjudicator found that none of the provisions of PIPA authorized the collection, use and disclosure for these other purposes without consent, and that consent had not been given.

The Adjudicator accordingly ruled that the Union's collection, use and disclosure of the personal information in the recordings for the other purposes contravened PIPA. She ordered the Union to cease the practice of collecting, using or disclosing personal information for the other purposes without consent, and to destroy any personal information still in its possession that it had collected, used or disclosed in contravention of the Act.

This decision is under judicial review.

AN ADJUDICATOR ORDERED THE EDMONTON POLICE SERVICE TO DISCLOSE MOST OF AN INVESTIGATIVE REPORT, BUT NOT VIDEO FOOTAGE, CAPTURING ALLEGED POLICE MISCONDUCT ORDER F2008-020 (MARCH 2009)

An applicant applied to the Edmonton Police Service (EPS) under the FOIP Act, requesting a video allegedly capturing police officers assaulting a homeless person, and an internal report investigating the matter. The EPS refused access to all the information. The Adjudicator found that disclosure of most of the investigative report was in the interest of public scrutiny of the EPS's investigation and resolution of serious allegations of misconduct involving police officers. However, he did not order disclosure of the video, as it did not contain the background, context and officers' viewpoints that were available in the report, and there was therefore a greater risk of unfair harm and unfair damage to the reputation of the police officers. Moreover, the factor relating to public scrutiny had less weight in relation to the video, given that the bulk of the report was to be disclosed. Finally, unlike the written report, the video captured

the personal information of the police officers and homeless person in the form of physical images, the disclosure of which the Adjudicator found would result in an unreasonable invasion of their personal privacy.

AN ADJUDICATOR REMINDED A PUBLIC BODY THAT A PERSON'S IDENTITY CAN BE IMPROPERLY REVEALED EVEN THOUGH A NAME IS NOT DISCLOSED
ORDER F2008-022 (MARCH 2009)

An individual complained that the Energy Resources Conservation Board (ERCB) improperly revealed to a gas facility operator that the complainant was the individual who had reported a gas odour. The ERCB argued that it did not disclose the complainant's personal information, as it merely indicated that he had been doing pipeline security work. The Adjudicator found that the information disclosed by the ERCB allowed third parties to identify the complainant. It did not matter that his name was not disclosed, that there may have been other individuals falling within the same description, or that he could only be identified because of additional things seen and known by third parties. As the ERCB did not establish that it had the authority to disclose the complainant's identity, the Adjudicator concluded that it contravened the FOIP Act.

THE COMMISSIONER AND ADJUDICATORS RESPONDED TO CHALLENGES TO THEIR JURISDICTION BASED ON ALLEGED FAILURE TO ADHERE TO THE TIMELINE SET OUT IN THE LEGISLATION
ORDERS F2006-031, F2007-014, F2007-031, F2008-003, F2008-005, F2008-013, F2008-016, F2008-017, F2008-018

The decision of the Court of Queen's Bench in *Kellogg Brown and Root v. Alberta (Information and Privacy Commissioner)* 2007ABQB 499 prompted a number of challenges to the jurisdiction of the Commissioner based on alleged failures to adhere to the timelines set out in the legislation. The court held in Kellogg, that section 50(5) of PIPA (which is similar to section 69(6) of the FOIP Act) was to be treated as a mandatory provision, and that the Commissioner had lost jurisdiction because section 50(5) had not been met.

In each of these jurisdictional challenges, the Commissioner or Adjudicator ruled that jurisdiction had not been lost. For many of the cases, this conclusion was based on a review of the facts of the particular case and a finding that the timelines had actually been met. As well, the decision-makers determined that even had they not been met, in the circumstances of the cases before them, the provision should be interpreted as directory rather than mandatory, or, if it was to be interpreted as obligatory, the legislature would not have intended that a loss of jurisdiction should result. These circumstances included that there would be no alternative remedy for the complainants for breach of their privacy rights or for applicants requesting information, any breach of the timelines by the office was technical or trivial, and as parties had participated in setting the dates for completion of the inquiries, they were not prejudiced by the Commissioner's failure to precisely anticipate the date of completion. The decision makers also found that section 69(6) permitted extension of the timeline after the 90-day period specified in the statutes had expired.

Some of these decisions are under judicial review.

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JUDICIAL REVIEWS & OTHER COURT DECISIONS

April 1, 2008 to March 31, 2009

CARITAS HEALTH GROUP V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2009 ABQB 186
(JUDICIAL REVIEW OF ORDERS F2008-012 AND H2008-003)
The Applicant applied for access to an email and a letter containing his personal information. The Adjudicator found that sections 17 (personal information), 18 (individual health or safety) and 27 (legal privilege) of the Freedom of Information and Protection of Privacy Act (FOIP) did not apply, and therefore Caritas could not withhold those records. The Adjudicator ordered disclosure of the records.

Caritas brought an application for judicial review. It argued three matters: section 17; breach of natural justice because the Adjudicator accepted an affidavit in camera; and section 27.

The Alberta Court of Queen's Bench (the Court) dismissed the application for judicial review. The Court held that the standard of review for a decision under section 17 of FOIP is reasonableness, and that the Adjudicator's decision under section 17 was reasonable.

The Court rejected the breach of natural justice argument, finding that what FOIP expressly requires under section 69(3) (no entitlement to anyone else's representations to the Commissioner) cannot be a breach of the principles of fairness.

Finally, the Court held that it was not necessary to resolve the standard of review for the Adjudicator's decision that the Wigmore criteria did not apply under section 27, since the Adjudicator's decision was correct and therefore also reasonable.

PENNY LANE ENTERTAINMENT GROUP V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2009 ABQB 140
(JUDICIAL REVIEW OF ORDER P2006-011)
An individual filed a complaint with the OIPC when a nightclub scanned his driver's licence prior to admitting him to the club. In an inquiry before the Commissioner under the *Personal Information Protection Act* (PIPA), the Organizations argued that the scanning system was put in place for reasons of patron safety and to discourage would-be trouble-makers from entering the venue.

The Commissioner found that the Organizations did not establish that they had a reasonable purpose under section 11 of PIPA when they collected and retained the drivers' licence information, since they did not provide any evidence to establish that collecting the drivers' licence information was in any way a deterrent to violent behaviour. The Commissioner ordered the Organizations to destroy the drivers' licence information that was collected, and to cease the practice of scanning drivers' licences.

The Organizations brought an application for judicial review, which was dismissed by the Court.

The Court held that the standard of review for a decision under section 11 of PIPA is reasonableness and that the Commissioner's decision was reasonable because it was within the scope of reasonable conclusions available to him under PIPA. Considering the lack of evidence tying the drivers' licence scanning system to safety and security, the Commissioner's interpretation of the facts, and his application of the facts to the law, his decision fell within the range of possible acceptable outcomes, which was defensible in respect of the facts and law.

UNIVERSITY OF ALBERTA V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2009 ABQB 112
(JUDICIAL REVIEW OF ORDER F2007-015)

An employee of the University filed a complaint under the *Freedom of Information and Protection of Privacy Act* with the Commissioner that the University had disclosed confidential employment information when it had posted a statistical summary concerning salary increments.

The Adjudicator found that the increments were evaluations. The statistical summaries contained sufficient detail to disclose the identities of the Complainant and other employees and the increment received. The Adjudicator ordered the University to stop publishing the increments/evaluations in the future. The University brought an application for judicial review, which was dismissed by the Court.

The Court found that the applicable standard of review for a decision under section 4(1)(h) (teaching materials) and section 4(1)(i) (research) of FOIP is reasonableness. The Court further said that a finding of whether information falls within the definition of "personal information" is a finding of fact or a question of mixed fact and law, and that such a determination is entitled to deference from the Court. Finally, the Court held that the Adjudicator did not err in finding that the University contravened Part 2 of FOIP, in allocating the burden of proof, or in weighing the evidence. The standard of review was reasonableness, and the Adjudicator's decisions were reasonable.

ADJUDICATION ORDER #6
JANUARY 30, 2009
(WITTMANN A.C.J., APPOINTED AS ADJUDICATOR UNDER SECTION 75 OF THE FOIP ACT)

The Complainant complained that the Information and Privacy Commissioner disclosed his personal information contrary to FOIP when the Commissioner sent a letter to the Complainant and copied that letter to three named individuals.

The Commissioner argued that section 4(1)(d) excluded that letter from the application of FOIP. The Adjudicator found that section 4(1)(d) did not apply. The Commissioner brought an application for judicial review, which will be heard in the summer of 2009.

BUSINESS WATCH INTERNATIONAL INC. V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2009 ABQB 10
(JUDICIAL REVIEW OF ORDERS F2007-001, F2007-002 AND P2007-001)

The City of Edmonton's Business Licence Bylaw (the Bylaw) requires pawnshops and second-hand stores to collect personal information from individuals who pawn or sell goods, together with a complete description of the pawned or sold goods.

The pawnshops and second-hand stores must then provide that information to the Edmonton Police Service (EPS).

The City Manager instructed pawnshops and second-hand stores to record that information in an electronic database. The City of Edmonton (the City) contracted with Business Watch International Inc. (BWI) to manage the database.

The Complainant pawned a DVD player and then, in a test case, requested a review by the Commissioner into the collection of the Complainant's personal information.

After conducting an inquiry, the Commissioner decided that:

- the personal information was collected by BWI for the City under the contract
- the personal information was therefore in the custody of the City
- BWI was an employee of the City, as provided by section 1(e) of FOIP
- under the Bylaw, the City did not have authority to require second-hand stores and pawnshops to upload the personal information to the database managed by BWI
- the City and EPS did not have the authority to collect personal information under sections 33 and 34 of FOIP
- the City did not take reasonable steps to safeguard personal information

The Commissioner ordered the City to destroy the database.

The City, EPS and BWI brought applications for judicial review. In EPS's application and submission, EPS raised for the first time the issue of section 50(5) of PIPA and section 69(6) of FOIP, which require that the Commissioner complete an inquiry within 90 days of receiving the request for review, or extend the time. The EPS argued that the Commissioner lost jurisdiction because he did not extend the time within the 90 days.

The Court quashed the Commissioner's orders. The Court said that the reasonableness standard applied to the timelines/loss of jurisdiction issue, and that the correctness standard applied to the decision based on municipal and employment law of central importance to the legal system.

The Court held that the Commissioner committed no reviewable error in continuing and concluding the inquiry despite non-compliance with the 90-day time limit under PIPA and FOIP, because the Commissioner's decision that the time limits were directory only and that he had not lost jurisdiction was reasonable.

For purposes of privacy law, the Court held that a municipal police force (EPS) is a public body separate from its host municipality (the City of Edmonton). The personal information collected from a private organization (pawnshop or second-hand stores) pursuant to legislative authority (municipal bylaw) and properly transmitted to police (EPS, pursuant to standing request for information) and properly received by the police service (because EPS is expressly authorized to receive it and because it is collected for law enforcement) is personal information properly in the hands of the police service. Furthermore, since BWI is not an employee of the City, the Court held that the Commissioner could not order the City to destroy the database.

BUSINESS WATCH INTERNATIONAL INC. V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2009 ABQB 79
(APPLICATIONS FOR COSTS AGAINST THE COMMISSIONER)

BWI and the City of Edmonton applied for costs against the Commissioner, on the grounds that the case raised exceptional circumstances that fell outside the usual rule that the Courts do not award costs for or against an administrative tribunal. The grounds were that the Commissioner chose a remedy that was outside his jurisdiction, he tried to prevent the parties from raising matters on judicial review, and he did not share the Kellogg Brown and Root Canada decision with the parties.

The Court denied the applications for costs. The Court held that, in these circumstances where the Commissioner's order had serious implications for the general law, it was important for the Commissioner to present arguments on both the standard of review and on jurisdiction. In granting a destruction order, the Commissioner only committed an error; he did not commit an egregious error. Attempts to prevent the parties' raising certain arguments were linked to questions of jurisdiction. Finally, there was no obligation on a tribunal to advise litigants of the case law which may be tangentially relevant to their situation; failure to do so does not rise to the status of a breach of natural justice.

KELLOGG BROWN AND ROOT CANADA V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2008 ABCA 384

In a Court of Queen's Bench decision reported at 2007 ABQB 499, the Court granted orders to Kellogg Brown and Root Canada and Syncrude Canada Ltd., prohibiting the Commissioner from conducting inquiries under PIPA into a complaint about drug and alcohol testing practices. The Court held that section 50(5) of PIPA was mandatory, and that the Commissioner had lost jurisdiction when he did not conduct an inquiry within the 90 days mandated by section 50(5).

The Commissioner appealed the Court's decision, which the Court of Appeal dismissed on the ground of mootness, since the Complainant had died. The notice of inquiry had framed the issues in a manner specific to the Complainant, so issues specific to him could not now be reviewed by the Commissioner.

STUBICAR V. ALBERTA (OFFICE OF THE INFORMATION AND PRIVACY COMMISSIONER)
2008 ABCA 357

In a judicial review of Order H2006-003, the Court of Queen's Bench had assigned three different standards of review to decisions of the Adjudicator. Those standards of review ranged from patent unreasonableness (duty to assist under section 10(a) of the *Health Information Act*), to reasonableness (whether severing of information was moot) to correctness (whether misapplying section 11(2)(a) of the *Health Information Act* amounted to a breach of the duty to assist). The Applicant appealed the Court's decisions which the Court of Appeal dismissed.

Following Dunsmuir v. New Brunswick, 2008 SCC 9, the Court of Appeal held that now there are only two standards of review: correctness and reasonableness. The patently unreasonable standard of review no longer exists. The Court of Appeal therefore had to consider only what standard of review applied to the duty to assist under section 10(a) of the *Health Information Act* (HIA).

The Court of Appeal first considered whether other court decisions had already determined the standard of review for that question. Following IMS Health Canada Limited v. Alberta (Information and Privacy Commissioner), 2008 ABQB 213, the Court of Appeal found that the question was not a pure question of law which could be separated from the facts. Therefore, the standard of review for that question was reasonableness, and the Adjudicator's decision on that question was reasonable.

ALBERTA TEACHERS' ASSOCIATION V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
ORAL DECISION RENDERED BY MARSHALL J. ON OCTOBER 9, 2008
(JUDICIAL REVIEW OF ORDER P2007-014)

Several individuals complained that the Alberta Teachers' Association (ATA) published their names in the ATA News, contrary to PIPA. The ATA claimed that PIPA did not apply since the ATA was authorized to publish the names under the "journalistic purposes" exception to PIPA.

The Adjudicator held that the ATA did not meet the exception for "journalistic purposes", that PIPA applied and that the ATA disclosed the names contrary to section 7 (consent) and section 19 (disclosure for reasonable purposes) of PIPA.

The ATA applied for judicial review. In its submission for the judicial review, the ATA raised for the first time the issue of section 50(5) of PIPA, which requires that the Commissioner complete an inquiry within 90 days of receiving the request for review, or extend the time. The ATA argued that the Commissioner lost jurisdiction because he did not extend the time within the 90 days.

The Court quashed the Commissioner's order. Following the Court of Queen's Bench decision in Kellogg Brown and Root Canada, the Court held that the Commissioner lost jurisdiction. Following the Supreme Court of Canada decision in Dunsmuir, the Court applied the correctness standard of review to what the Court said was a matter of jurisdiction.

The Commissioner has appealed the Court's decision. The appeal will be heard in the fall of 2009.

IMS HEALTH CANADA LIMITED V. ALBERTA (INFORMATION AND PRIVACY COMMISSIONER)
2008 ABQB 213
(JUDICIAL REVIEW OF ORDER H2002-003)

Pharmacists and pharmacies disclosed prescription information to IMS. The information included prescribing physician names, which is "health services provider information" under the HIA.

The Commissioner held that section 37(2)(a) of the HIA required that pharmacists and pharmacies must obtain the consent of prescribing physicians to disclose their names to IMS. Since there was no consent, the Commissioner found that the disclosure was not in compliance with the HIA.

The Court quashed the Commissioner's order. The Court held that the reasonableness standard of review applied to the Commissioner's decision, given the Commissioner's expertise, and that it was reasonable for the Commissioner to investigate whether disclosure complied with the HIA. However, the Commissioner's interpretation of section 37(2)(a) was unreasonable. The Commissioner improperly expanded the scope of protection beyond individually identifying information about health services providers, resulting in unreasonable expansion of the requirement to obtain consent.

STATISTICAL INFORMATION

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TABLE 1:
CASES OPENED 2008 - 2009 FISCAL YEAR FOIP, HIA, PIPA

Statistics are from the period April 1, 2008 to March 31, 2009

Case Type	FOIP	HIA	PIPA
Advice and Direction	3	0	0
Authorization to Disregard a Request	7	1	1
Complaint	79	17	223
Excuse Fees	3	0	0
Investigation Generated by Commissioner	9	15	1
Offense Investigation	0	0	0
Privacy Impact Assessments	30	374	1
Request for Information	54	65	5
Request for Review	178	30	78
Request for Review 3rd Party	15	0	0
Request Time Extension	42	2	0
Self-reported Breach	21	60	27
Total	441	564	336

Please refer to Appendix A for a complete listing of the cases opened in the 2008 - 2009 fiscal year

Note: Only FOIP allows a 3rd Party to request a review of a Public Body's decision to release 3rd Party information to an applicant.

TABLE 2:
CASES CLOSED 2008 - 2009 FISCAL YEAR FOIP, HIA,PIPA

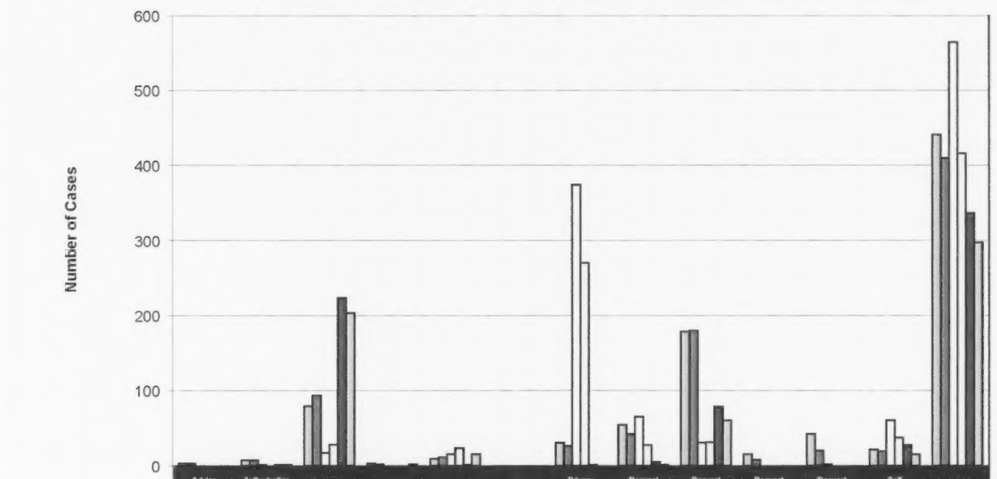
Statistics are from the period April 1, 2008 to March 31, 2009

Case Type	FOIP	HIA	PIPA
Advice and Direction	3	0	0
Authorization to Disregard a Request	9	1	1
Complaint	61	24	160
Excuse Fees	0	0	1
Investigation Generated by Commissioner	9	14	7
Offense Investigation	0	0	0
Privacy Impact Assessments	34	434	1
Request for Information	51	66	3
Request for Review	150	43	61
Request for Review 3rd Party	11	0	0
Request Time Extension	42	2	0
Self-reported Breach	21	62	25
Total	391	646	259

*Includes individuals, media, agents, third party agents, agent applicants, MLAs, companies, others, special interest groups.

GRAPH 1:
TOTAL NUMBER OF CASES OPENED - A TWO YEAR COMPARISON

Statistics are from the period April 1, 2008 to March 31, 2009



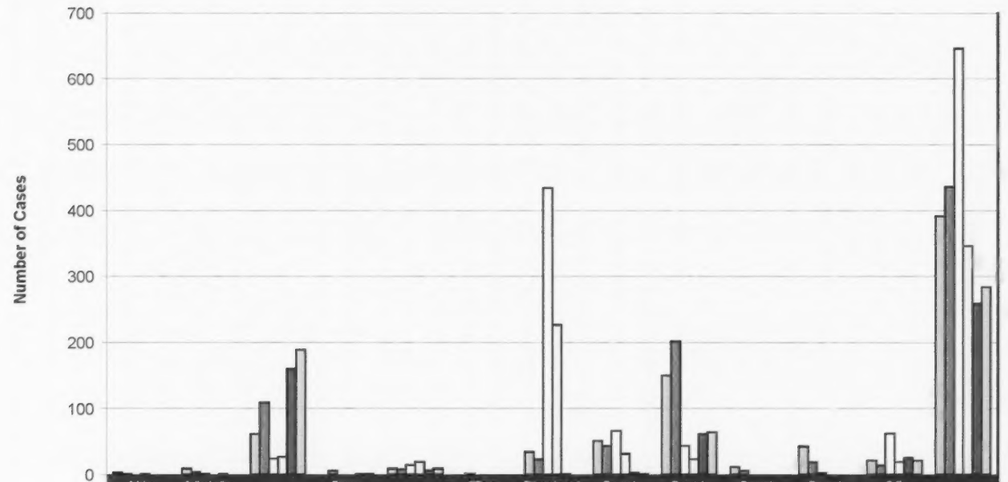
	Advice & Direction	Authorization to Disregard	Complaint	Excuse Fees	Investigation Generated	Offense Investigation	Privacy Impact Assessment	Request for Information	Request for Review	Request for Review 3rd Party	Request Time Extension	Self Reported Breach	TOTAL
FOIP Cases Opened 2009	3	7	79	3	9	0	30	54	178	15	42	21	441
FOIP Cases Opened 2008	3	7	93	2	11	0	26	42	179	8	20	19	410
HIA Cases Opened 2009	0	1	17	0	15	0	374	65	30	0	2	60	564
HIA Cases Opened 2008	0	0	28	0	23	0	270	27	31	0	0	37	416
PIPA Cases Opened 2009	0	1	223	0	1	0	1	5	78	0	0	27	336
PIPA Cases Opened 2008	0	1	203	2	15	0	0	1	60	0	0	15	297

Please refer to Appendix A for a complete listing of the cases opened in the 2008-2009 fiscal year.
Previous Annual Reports reported Self-reported Breaches under the category of Request for Information.

Note: Only FOIP allows a 3rd Party to request a review of a Public Body's decision to release 3rd Party information to an applicant.

GRAPH 2:
TOTAL NUMBER OF CASES CLOSED - A TWO YEAR COMPARISON

Statistics are from the period April 1, 2008 to March 31, 2009



	Advice & Direction	Authorization to Disregard	Complaint	Excuse Fees	Investigation Generated	Offense Investigation	Privacy Impact Assessment	Request for Information	Request for Review	Request for Review 3rd Party	Request Time Extension	Self Reported Breach	TOTAL
FOIP Cases Closed 2009	3	9	61	0	9	0	34	51	150	11	42	21	391
FOIP Cases Closed 2008	1	4	109	6	8	1	23	43	202	6	19	14	436
HIA Cases Closed 2009	0	1	24	0	14	0	434	66	43	0	2	62	646
HIA Cases Closed 2008	1	0	27	0	19	0	226	31	23	0	0	19	346
PIPA Cases Closed 2009	0	1	160	1	7	0	1	3	61	0	0	25	259
PIPA Cases Closed 2008	0	0	188	1	9	0	0	1	64	0	0	21	284

Please refer to Appendix B for a complete listing of the cases closed in the 2008-2009 fiscal year.
Previous Annual Reports reported Self-reported Breaches under the category of Request for Information.

Note: Only FOIP allows a 3rd Party to request a review of a Public Body's decision to release 3rd Party information to an applicant.

TABLE 3:
CASES OPENED BY PUBLIC, BODIES SUBJECT TO THE LEGISLATION, AND COMMISSIONER ON OWN MOTION

Statistics are from the period April 1, 2008 to March 31, 2009

Type	Number of Cases	Percentage
FOIP		
Investigation Generated by Commissioner	9	2%
Public Bodies	157	36%
*Public	275	62%
Total	441	100%
HIA		
Investigation Generated by Commissioner	15	3%
Custodian	502	89%
*Public	47	8%
Total	564	100%
PIPA		
Investigation Generated by Commissioner	1	1%
Organization	34	10%
*Public	301	89%
Total	336	100%

* Includes individuals, media, agents, third party agents, agent applicants, MLAs, companies, others, special interest groups.

TABLE 4:
PERCENT OF CASES CLOSED BY RESOULUTION METHOD

Statistics are from the period April 1, 2008 to March 31, 2009

Resolution Method	Number of Cases FOIP	Number of Cases HIA	Number of Cases PIPA	Total	Percentage
*Resolved by Mediation/ Investigation	190	62	215	467	91%
Resolved by Order	32	5	7	44	9%
Total	222	67	222	511	100%

FOIP Orders: **27 (32 cases)**
HIA Orders: **5 (5 cases)**
PIPA Orders: **7 (7 cases)**

Note: Some Orders and/or Report Numbers were assigned to more than one case. Some cases had more than one Order.

Note: Orders are recorded by the date the Order was signed, rather than the date the Order was publicly released.

Note: Under the legislation, only certain case types can proceed to inquiry if the matters are not resolved at mediation/investigation. The above statistics are those case types that can proceed to inquiry (Request for Review, Request for Review 3rd Party, Request to Excuse Fees and Complaint files).

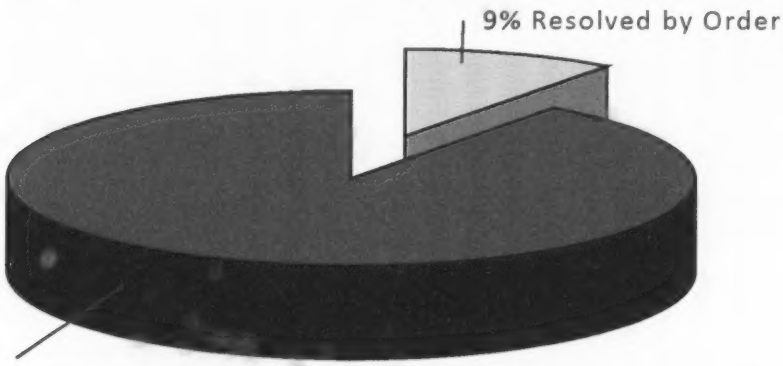
Note: This table only includes Orders issued that concluded/closed the file. See Appendix C for a listing of all Orders issued.

Please refer to Tables 1 and 2 and Appendices A and B for total cases opened and closed.

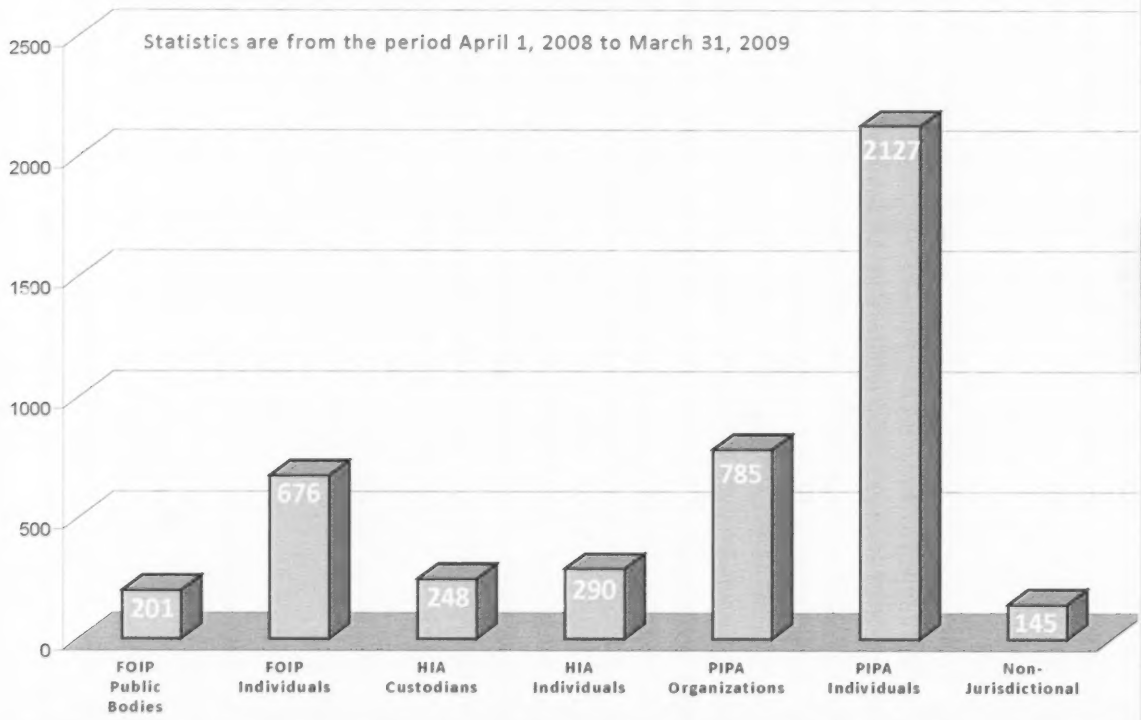
A copy of all Orders and Investigation Reports are available on the Office's web site www.OIPC.ab.ca

*Includes individuals, media, agents, third party agents, agent applicants, MLAs, companies, others, special interest groups.

GRAPH 3:
PERCENTAGE OF CASES CLOSED BY RESOLUTION METHOD



GRAPH 4:
FOIP, HIA & PIPA NON-CASE RELATED TELEPHONE, E-MAIL & WRITTEN ENQUIRIES



OFFICE OF THE INFORMATION & PRIVACY COMMISSIONER
FINANCIAL STATEMENTS

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AUDITOR GENERAL
Alberta

Auditor's Report

To the Members of the Legislative Assembly

I have audited the statement of financial position of the Office of the Information and Privacy Commissioner as at March 31, 2009 and the statements of operations and cash flows for the year then ended. These financial statements are the responsibility of the Office's management. My responsibility is to express an opinion on these financial statements based on my audit.

I conducted my audit in accordance with Canadian generally accepted auditing standards. Those standards require that I plan and perform an audit to obtain reasonable assurance whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation.

In my opinion, these financial statements present fairly, in all material respects, the financial position of the Office as at March 31, 2009 and the results of its operations and its cash flows for the year then ended in accordance with Canadian generally accepted accounting principles.

[Original signed by Fred Dunn, FCA]

FCA
Auditor General

Edmonton, Alberta
July 9, 2009

STATEMENT OF OPERATIONS

YEAR ENDED MARCH 31, 2009

	2009		2008
	Budget	Actual	Actual
Revenues			
Prior Year Expenditure Refund	$ -	$ 11,548	$ 14,824
Other Revenue	-	270	166
	-	11,818	14,990
Expenses - Directly Incurred (Note 3b)			
Voted			
Salaries, Wages, and Employee Benefits	$ 4,470,000	$ 4,182,081	$ 3,870,665
Supplies and Services	1,039,000	1,211,428	866,960
Supplies and Services from Support Arrangements with Related Parties (Note 7)	-	-	1,293
Amortization	40,000	31,334	53,526
Total Voted Expenses before Recoveries	5,549,000	5,424,843	4,792,444
Less: Recovery from Support Service Arrangements with Related Parties (Note 7)	-	(20,000)	(21,135)
	5,549,000	5,404,843	4,771,309
Statutory			
Valuation Adjustments			
Provision for Vacation Pay	-	39,646	12,705
Provision for Doubtful Accounts	-	-	947
	-	39,646	13,652
	5,549,000	5,444,489	4,784,961
Gain (Loss) on Disposal of Capital Assets	-	(5,340)	5
Net Operating Results	$ (5,549,000)	$ (5,438,011)	$ (4,769,966)

The accompanying notes and schedules are part of these financial statements.

STATEMENT OF FINANCIAL POSITION

AS AT MARCH 31, 2009

	2009	2008
Assets		
Cash	$ 100	$ 100
Accounts Receivable	2,500	8,495
Prepaid Expenses	3,737	22,934
Tangible Capital Assets (Note 4)	85,939	117,582
	$ 92,276	$ 149,111
Liabilities		
Accounts Payable & Accrued Liabilities	$ 393,862	$ 270,093
Accrued Vacation Pay	347,623	307,977
	741,485	578,070
Net Liabilities		
Net Liabilities at Beginning of Year	(428,959)	(394,844)
Net Operating Results	(5,438,011)	(4,769,966)
Net Financing Provided from General Revenues	5,217,761	4,735,851
	(649,209)	(428,959)
	$ 92,276	$ 149,111

The accompanying notes and schedules are part of these financial statements.

STATEMENT OF CASH FLOWS

YEAR ENDED MARCH 31, 2009

	2009	2008
Operating Transactions		
Net Operating Results	$ (5,438,011)	$ (4,769,966)
Non-cash Items Included in Net Operating Results		
Amortization of Tangible Capital Assets	31,334	53,526
Valuation Adjustments	39,646	13,652
Loss (Gain) on Disposal of Capital Assets	5,340	(5)
	(5,361,691)	(4,702,793)
Decrease (Increase) in Accounts Receivable	5,995	(1,044)
Decrease in Prepaid Expenses	19,197	6,353
Increase (Decrease) in Accounts Payable	123,769	(31,956)
Cash Applied to Operating Transactions	(5,212,730)	(4,729,440)
Capital Transactions		
Disposal of Capital Assets	856	5
Acquisition of Capital Assets	(5,887)	(6,566)
	(5,031)	(6,561)
Financing Transactions		
Net Financing Provided From General Revenues	5,217,761	4,735,851
Decrease in Cash	-	(150)
Cash, Beginning of Year	100	250
Cash, End of Year	$ 100	$ 100

The accompanying notes and schedules are part of these financial statements.

NOTES TO THE FINANCIAL STATEMENTS

YEAR ENDED MARCH 31, 2009

NOTE 1 AUTHORITY

The Office of the Information and Privacy Commissioner operates under the authority of the *Freedom of Information and Protection of Privacy Act*. The net cost of the operations of the Office is borne by the General Revenue Fund of the Province of Alberta. Annual operating budgets are approved by the Select Standing Committee on Legislative Offices.

NOTE 2 PURPOSE

The Office of the Information and Privacy Commissioner provides oversight on the following legislation governing access to information and protection of privacy:

Freedom of Information and Protection of Privacy Act
Health Information Act
Personal Information Protection Act

The major operational purposes of the Office of the Information and Privacy Commissioner are:

- To provide independent reviews of decisions made by public bodies, custodians and organizations and provide resolution of complaints under the Acts;
- To advocate protection of privacy for Albertans; and
- To promote openness and accountability for Alberta public bodies.

NOTE 3 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES & REPORTING PRACTICES

These financial statements are prepared in accordance with Canadian generally accepted accounting principles for the public sector as recommended by the Public Sector Accounting Board of the Canadian Institute of Chartered Accountants.

a) **Reporting Entity**
The reporting entity is the Office of the Information and Privacy Commissioner (the Office), for which the Information and Privacy Commissioner is responsible.

The Office operates within the General Revenue Fund (the Fund). The Fund is administered by the Minister of Finance and Enterprise. All cash receipts of the Office are deposited into the Fund and all cash disbursements made by the Office are paid from the Fund. Net Financing provided from General Revenues is the difference between all cash receipts and all cash disbursements made.

b) **Basis of Financial Reporting**

REVENUES
All revenues are reported on the accrual basis of accounting.

EXPENSES

Directly Incurred
Directly incurred expenses are those costs the Office has primary responsibility and accountability for, as reflected in the Office's budget documents.

In addition to program operating expenses such as salaries, supplies, etc., directly incurred expenses also include:

- Amortization of tangible capital assets;
- Pension costs which comprise the cost of employer contributions for current services of employees during the year; and
- Valuation adjustments which represent the change in management's estimate of future payments arising from obligations relating to vacation pay.

Incurred by Others
Services contributed by other entities in support of the Office's operations are disclosed in Schedule 2.

NOTE 3 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES & REPORTING PRACTICES (continued)

b) Basis of Financial Reporting (continued)

ASSETS
Financial assets of the Office are limited to financial claims, such as receivables from other organizations.

Tangible capital assets of the Office are recorded at historical cost and are amortized on a straight-line basis, over the estimated useful lives of the assets. The threshold for tangible capital assets is $5,000.

LIABILITIES
Liabilities are recorded to the extent that they represent present obligations as a result of events and transactions occurring prior to the end of the fiscal year. The settlement of liabilities will result in sacrifice of economic benefits in the future.

NET LIABILITIES
Net liabilities represents the difference between the carrying value of assets held by the Office and its liabilities.

VALUATION OF FINANCIAL ASSETS AND LIABILITIES
Fair value is the amount of consideration agreed upon in an arm's length transaction between knowledgeable, willing parties who are under no compulsion to act.

The fair values of accounts receivable, accounts payable and accrued liabilities are estimated to approximate their carrying values because of the short term nature of these instruments.

NOTE 4 TANGIBLE CAPITAL ASSETS

	Office Equipment & Furniture	Computer Hardware & Software	2009 Total	2008 Total
Estimated Useful Life	10 years	3 years		
Historical Cost				
Beginning of Year	$ 322,108	$ 376,030	$ 698,138	$ 802,638
Additions	-	5,887	5,887	6,566
Disposals, Including Write-Downs	(38,830)	(228,806)	(267,636)	(111,066)
	$ 283,278	$ 153,111	$ 436,389	$ 698,138
Accumulated Amortization				
Beginning of Year	$ 213,205	$ 367,351	$ 580,556	$ 638,096
Amortization Expense	25,322	6,012	31,334	53,526
Effect of Disposals	(32,634)	(228,806)	(261,440)	(111,066)
	$ 205,893	$ 144,557	$ 350,450	$ 580,556
Net Book Value at March 31, 2009	$ 77,385	$ 8,554	$ 85,939	
Net Book Value at March 31, 2008	$ 108,903	$ 8,679		$ 117,582

NOTE 5 DEFINED BENEFIT PLANS

The Office participates in the multiemployer pension plans, Management Employees Pension Plan and Public Service Pension Plan. The Office also participates in the multiemployer Supplementary Retirement Plan for Public Service Managers. The expense for these pension plans is equivalent to the annual contributions of $443,104 for the year ending March 31, 2009 (2008 –$400,236).

At December 31, 2008, the Management Employees Pension Plan reported a deficiency of $568,574,000 (2007 –$84,341,000) and the Public Service Pension Plan reported a deficiency of $1,187,538,000 (2007 –$92,509,000 as restated). At December 31, 2008, the Supplementary Retirement Plan for Public Service Managers had a deficiency of $7,111,000 (2007 – surplus of $1,510,000).

The Office also participates in a multiemployer Long Term Disability Income Continuance Plan. At March 31, 2009, the Management, Opted Out and Excluded Plan reported an actuarial deficiency of $1,051,000 (2008 – actuarial surplus of $7,874,000). The expense for this plan is limited to employer's annual contributions for the year.

NOTE 6 CONTRACTUAL OBLIGATIONS

	2009 Total	2008 Total
Service Contracts	$ 18,426	$ 26,943
Long-term Leases	350	817
	$ 18,776	$ 27,760

The aggregate amounts payable for the unexpired terms of these contractual obligations are as follows:

	Service Contracts	Long-term Leases	Total
2010	$ 15,226	$ 350	$ 15,576
2011	1,920	-	1,920
2012	1,280	-	1,280
	$ 18,426	$ 350	$ 18,776

NOTE 7 RELATED PARTY TRANSACTIONS

The Office of the Information and Privacy Commissioner provides financial and information technology services to the Office of the Ethics Commissioner. Recovery from Support Service Arrangements with Related Parties, in the amount of $20,000 is disclosed as a recovery of expenses.

NOTE 8 APPROVAL OF FINANCIAL STATEMENTS

These financial statements were approved by the Information and Privacy Commissioner.

SCHEDULE 1 - SALARY & BENEFITS DISCLOSURE

YEAR ENDED MARCH 31, 2009

	2009				2008
	Base Salary [a]	Other Cash Benefits [b]	Other Non- Cash Benefits [c]	Total	Total
Senior Official Information & Privacy Commissioner [d]	$ 218,172	$ 7,165	$ 56,927	$ 282,264	$ 238,708

Prepared in accordance with Treasury Board Directive 12/98 as amended.

(a) Base salary includes regular base pay.

(b) Other cash benefits include vacation payments, overtime and lump sum payments.

(c) Other non-cash benefits include the government's share of all employee benefits and contributions or payments made on behalf of employee, including pension, health care, dental coverage, group life insurance, short and long term disability plans, professional memberships and tuition fees (as applicable).

(d) Automobile provided, no dollar amount included in other non-cash benefits.

SCHEDULE 2 - ALLOCATED COSTS

YEAR ENDED MARCH 31, 2009

	2009					2008
		Expenses Incurred by Others		Valuation Adjustments [d]		
Program	Expenses [a]	Accommodation Costs [b]	Telephone Costs [c]	Vacation Pay	Total Expenses	Total Expenses
Operations	$ 5,404,843	$ 350,861	$ 15,781	$ 39,646	$ 5,811,131	$ 5,091,821

(a) Expenses - Directly Incurred as per Statement of Operations, excluding valuation adjustments.

(b) Costs shown for Accommodation includes grants in lieu of taxes.

(c) Telephone Costs is the line charge for all phone numbers.

(d) Valuation Adjustments as per Statement of Operations.

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APPENDIX A: CASES OPENED 2008 - 2009 FISCAL YEAR BY PUBLIC BODY CUSTODIAN & ORGANIZATION TYPE

	Advice & Direction	Authorization to Disregard Request	Complaint	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review 3rd Party	Request Time Extension	Self-reported Breach	Total
FOIP PUBLIC BODY TYPE													
Boards	0	0	5	0	0	0	2	0	4	5	0	1	17
Child and Family Service Authorities	0	0	3	0	0	0	0	0	2	0	2	1	8
Colleges	0	0	2	0	1	0	0	5	3	0	0	2	13
Commissions	0	1	1	0	0	0	1	0	3	0	0	0	6
Crown Corporation	1	0	1	0	0	0	0	1	3	0	2	0	8
Government Ministries/Departments	0	0	16	2	4	0	16	31	38	7	23	10	147
Foundations	0	0	1	0	0	0	0	0	0	0	0	0	1
Law Enforcement Agencies	0	0	7	1	1	0	0	3	23	0	2	0	37
Local Government Bodies	0	1	1	0	1	0	0	0	3	0	0	0	6
Long Tem Care Center	0	0	1	0	0	0	0	0	2	0	0	0	3
Metis Settlements	0	0	1	0	0	0	0	0	0	0	0	0	1
Municipalities	1	2	14	0	1	0	4	8	36	1	1	1	69
Officers of the Legislature	0	0	1	0	0	0	0	0	0	0	0	0	1
Premier's Office	0	0	0	0	0	0	0	1	0	0	0	0	1
Regional Health Authorities	0	0	11	0	0	0	5	0	15	2	1	2	36
School Districts	0	3	9	0	1	0	0	2	28	0	4	3	50
Universities	0	0	5	0	0	0	1	2	18	0	7	1	34
*Other Public Bodies	1	0	0	0	0	0	1	1	0	0	0	0	3
Total	3	7	79	3	9	0	30	54	178	15	42	21	441
* Public Body types identified as "Other" category include: Parties contracted by a Public Body.													
HIA CUSTODIAN TYPE													
Alberta Health and Wellness	0	0	0	0	0	0	10	14	0	0	0	7	31
Custodians Pursuant to the Regulations	0	0	1	0	1	0	0	0	0	0	0	0	2
Long Term Care Facilities	0	0	1	0	1	0	10	5	1	0	0	1	19
Pharmacies/Pharmacists	0	0	0	0	2	0	125	2	1	0	0	2	132
Provincial Boards	0	0	1	0	0	0	10	1	1	0	0	0	13
Physicians	0	1	7	0	5	0	141	16	10	0	0	15	195
Regional Health Authorities	0	0	7	0	6	0	75	13	17	0	2	35	155
* Other Custodians	0	0	0	0	0	0	3	14	0	0	0	0	17
Total	0	1	17	0	15	0	374	65	30	0	2	60	564
* Custodian types identified as "Other" category include: Community Health Councils, Chiropractors, Dental Mechanics, Dental Surgeons, Opticians, Optometrists, Osteopaths, Podiatrists and Subsidiary Health Corporations.													
PIPA ORGANIZATION TYPE													
Accommodation & Food Services	0	0	16	0	0	0	0	0	4	0	0	0	20
Admin & Support Services	0	0	5	0	0	0	0	0	3	0	0	0	8
Construction	0	0	2	0	0	0	0	0	7	0	0	0	9
Educational Services	0	0	2	0	0	0	0	0	1	0	0	0	3
Finance	0	0	18	0	0	0	0	0	3	0	0	7	28
Private Healthcare & Social Assistance	0	0	18	0	1	0	1	0	8	0	0	4	32
Information & Cultural Industries	0	0	5	0	0	0	0	0	0	0	0	0	5
Insurance Industry	0	1	13	0	0	0	0	0	9	0	0	3	26
Manufacturing	0	0	3	0	0	0	0	0	5	0	0	1	9
Mining, Oil & Gas	0	0	21	0	0	0	0	0	11	0	0	1	33
Professional, Scientific & Technical	0	0	9	0	0	0	0	1	6	0	0	2	18
Public Administration	0	0	1	0	0	0	0	1	0	0	0	0	2
Real Estate, Rental, Leasing	0	0	25	0	0	0	0	0	1	0	0	0	26
Retail	0	0	34	0	0	0	0	0	5	0	0	2	41
Transportation	0	0	1	0	0	0	0	0	0	0	0	1	2
Utilities	0	0	5	0	0	0	0	0	1	0	0	1	7
Wholesale Trade	0	0	7	0	0	0	0	0	1	0	0	0	8
Arts, Entertainment & Recreation	0	0	3	0	0	0	0	0	2	0	0	0	5
*Other Services	0	0	35	0	0	0	0	3	11	0	0	5	54
Total	0	1	223	0	1	0	1	5	78	-	-	27	336

* Other Services include repair, personal care, beauty shops, unions, parking lots, religious organizations, business associations, political organizations, professional regulatory organizations, courier services, agricultural companies and condo boards.

APPENDIX B: CASES CLOSED 2008 - 2009 FISCAL YEAR BY PUBLIC BODY CUSTODIAN & ORGANIZATION TYPE

	Advice & Direction	Authorization to Disregard Request	Complaint	Excuse Fees	Investigation Generated by Commissioner	Offense Investigation	Privacy Impact Assessments	Request for Information	Request for Review	Request for Review 3rd Party	Request Time Extension	Self-reported Breach	Total
FOIP PUBLIC BODY TYPE													
Boards	0	0	5	0	0	0	1	0	9	2	0	1	18
Child & Family Service Authorities	0	0	4	0	0	0	0	0	4	0	2	0	10
Colleges	0	0	2	0	1	0	1	4	2	0	0	3	13
Commissions	1	0	1	0	0	0	0	0	2	0	0	0	4
Crown Corporation	1	0	0	0	0	0	0	0	0	0	2	0	3
Government Ministries /Departments	0	1	11	0	6	0	18	32	52	8	24	8	160
Foundations	0	0	1	0	0	0	0	0	0	0	0	0	1
Independent Agency	0	0	0	0	0	0	0	0	0	0	0	0	0
Law Enforcement Agencies	1	0	7	0	0	0	0	3	26	0	1	0	38
Local Government Bodies	0	1	2	0	1	0	0	0	1	0	0	0	5
Long Term Care Centers	0	0	3	0	0	0	0	0	1	0	0	0	4
Metis Settlements	0	0	1	0	0	0	0	0	0	0	0	0	1
Municipalities	0	2	12	0	1	0	2	7	21	0	1	0	46
Officers of the Legislature	0	0	1	0	0	0	1	0	0	0	0	0	2
Premier's Office	0	0	0	0	0	0	0	1	1	0	0	0	2
Regional Health Authorities	0	0	1	0	0	0	8	0	13	1	1	2	26
School Districts	0	5	8	0	0	0	0	2	7	0	4	4	30
Universities	0	0	2	0	0	0	2	2	11	0	7	3	27
*Other	0	0	0	0	0	0	1	0	0	0	0	0	1
Total	3	9	61	0	9	0	34	51	150	11	42	21	391
* Public Body types identified as "Other" category include: Parties contracted by a Public Body.													
HIA CUSTODIAN TYPE													
Alberta Health and Wellness	0	0	3	0	0	0	11	14	0	0	0	13	41
Custodians Pursuant to the Regulations	0	0	0	0	0	0	2	1	1	0	0	0	4
Long Term Care Facilities (LTCC)	0	0	2	0	0	0	25	5	2	0	0	1	35
Pharmacies/Pharmacists	0	0	1	0	2	0	163	5	0	0	0	2	173
Physicians	0	1	8	0	7	0	143	17	18	0	0	17	211
Provincial Boards	0	0	1	0	1	0	5	1	1	0	0	0	9
Regional Health Authorities	0	0	8	0	4	0	73	13	21	0	2	29	150
*Other Custodians	0	0	1	0	0	0	12	10	0	0	0	0	23
Total	0	1	24	0	14	0	434	66	43	0	2	62	646
* Custodian types identified as "Other" category include: Community Health Councils, Chiropractors, Dental Mechanics, Dental Surgeons, Opticians, Optometrists, Osteopaths and Podiatrists.													
PIPA ORGANIZATION TYPE													
Accommodation & Food Services	0	0	10	0	1	0	0	0	4	0	0	0	15
Admin & Support Services	0	0	6	0	0	0	0	0	3	0	0	0	9
Construction	0	0	0	0	0	0	0	0	4	0	0	0	4
Educational Services	0	0	2	0	0	0	0	0	1	0	0	0	3
Finance	0	0	12	0	0	0	0	0	3	0	0	6	21
Private Healthcare & Social Assistance	0	0	14	0	1	0	1	0	5	0	0	4	25
Information & Cultural Industries	0	0	1	0	1	0	0	0	0	0	0	0	2
Insurance Industry	0	0	5	0	0	0	0	0	6	0	0	3	14
Manufacturing	0	0	3	0	0	0	0	0	2	0	0	1	6
Mining, Oil & Gas	0	0	7	0	0	0	0	0	9	0	0	1	17
Professional, Scientific & Tech	0	0	5	1	0	0	0	1	6	0	0	2	15
Public Administration	0	0	2	0	0	0	0	0	0	0	0	0	2
Real Estate, Rental & Leasing	0	0	14	0	0	0	0	0	1	0	0	0	15
Retail	0	0	34	0	2	0	0	0	6	0	0	2	44
Transportation	0	0	2	0	0	0	0	0	0	0	0	1	3
Utilities	0	0	7	0	0	0	0	0	1	0	0	0	8
Wholesale Trade	0	0	2	0	0	0	0	0	1	0	0	0	3
Arts, Entertainment & Recreation	0	0	5	0	0	0	0	0	1	0	0	0	6
*Other Services	0	1	29	0	2	0	0	2	8	0	0	5	47
Total	0	1	160	1	7	0	1	3	61	0	0	25	259

*Other Services include repair, personal care, beauty shops, unions, parking lots, religious organizations, business associations, political organizations, professional regulatory organizations, courier services, agricultural companies and condo boards.

APPENDIX C: ORDERS & PUBLIC INVESTIGATION REPORTS ISSUED

	Orders	Decisions	Public Investigation Reports	Total
FOIP RESPONDENT				
Alberta Children & Youth Services	1	0	0	1
Alberta Employment & Immigration	0	2	0	2
Alberta Employment, Immigration & Industry	2	0	0	2
Energy Resources Conservation Board	1	0	0	1
Alberta Finance & Enterprise	3	0	0	3
Alberta Health & Wellness	1	0	0	1
Alberta Infrastructure	1	0	0	1
Alberta Justice & Attorney General	1	0	0	1
Alberta Seniors & Community Supports	1	0	0	1
Calgary Board of Education	1	0	0	1
Calgary Police Service	1	0	0	1
Calgary Parking Authority	0	0	1	1
Caritas Health Group	1	0	0	1
City of Calgary	1	0	0	1
City of Edmonton	1	0	0	1
County of Vermilion River #24	1	0	0	1
Edmonton Police Commission	2	1	0	3
Edmonton Police Service	9	0	0	9
Edmonton Public School Board	1	0	0	1
Grande Yellowhead Reg. Div. #35	1	0	0	1
Intercare Corporate Group Inc.	0	0	1	1
Lethbridge Regional Police Commission	1	0	0	1
Sub-Total	31	3	2	36
HIA RESPONDENT				
Alberta Health and Wellness/David Thompson Health Region/Olds Value Drug Mart	0	0	1	1
Calgary Health Region	2	0	0	2
Capital Health Region	2	0	0	2
Caritas Health Group	1	0	0	1
Dr. David F. Meller	0	0	1	1
Dr. Jaime Wagan Namit/Lamont Health Care Centre/Great West Life Assurance Company	0	0	1	1
Dr. Deji Raphael Akintola	0	0	1	1
East Central Health	0	0	1	1
Sub-Total	5	0	5	10
PIPA RESPONDENT				
Alberta College of Psychologists	1	0	0	1
Alberta School Employee Benefit Plan (ASEBP)	1	0	0	1
Barbara Sheptycki (Registered Psychologist)	1	0	0	1
Canada Life Assurance Company	0	0	1	1
CUPE Local 3550	1	0	0	1
Great West Life Assurance Company	0	0	1	1
Empire Ballroom (1208558 Alberta Ltd.)	0	0	1	1
Leon's Furniture Ltd.	1	0	0	1
Meyers Norris Penny Limited	1	0	0	1
Real Estate Council of Alberta	1	0	0	1
TransAlta Corporation and Kelly, Luttmer & Associates Ltd.	0	0	1	1
United Food & Commercial Workers Local 401	1	0	0	1
Sub-Total	8	0	4	12
Total	44	3	11	58

* This Table contains all Orders released by the OIPC whether the issuance of the Order concluded the matter or not. The OIPC has issued Orders during this Fiscal Year that related to the matter but did not conclude/close the file.

*FOIP Orders: 31 (37 cases)
HIA Orders: 5 (5 cases)
PIPA Orders: 8 (8 cases)

Note: Orders with one order number covering more than one public body or organization are counted as one order; an order containing more than one order number is counted according to the number of order numbers listed on the order.
Note: Some Orders and/or Report Numbers were assigned to more than one case.
Note: Orders are recorded by the date the Order was signed, rather than the date the Order was publicly released.
Note: Under the legislation, only certain case types can proceed to inquiry if the matters are not resolved at mediation/investigation. The above statistics are those case types that can proceed to inquiry (Request for Review and Complaint files).

Please refer to Tables 1 and 2 and Appendices A and B for total cases opened and closed. A copy of all Orders and Investigation Reports are available on the Office's web site www.OIPC.ab.ca

APPENDIX D: ACCEPTED PRIVACY IMPACT ASSESSMENTS BY PUBLIC BODY & CUSTODIAN TYPE : 2008 - 2009

PUBLIC BODY	PIA TITLE
Alberta Advanced Education & Technology	Alberta Post-Secondary Application System (APAS)
	Student Financial Assistance Service Delivery Initiative
Alberta Children and Youth Services	Alberta Children's Services Special Case Review Database
	Child and Youth Financial Suite Project
	Family Support for Children with Disabilities (FSCD) Information System PIA Addendum Report
Alberta Employment, Immigration & Industry	Safety Checklist for Adolescent Employment in Restaurant and Food Service
	Contract Management Administration System (CMAS)
	Remote Contact Centre Advisor (RCCA) Initiative
Alberta Finance and Enterprise	Unclaimed Personal Property Vested Property Act (UPPVPA)
Alberta Health and Wellness	Management of Duplicative Claims Submitted to the WCB and AHW
Alberta Seniors and Community Supports	Personal Directives Registry (PDR)
Alberta Solicitor General and Public Security	Offender Risk/Need Assesment - Data Hosting
	Iris Scan Project
Alberta Transportation	Coordination and Information Centre
Service Alberta	Land Titles Pending Submissions Project (Draft)
	Land Titles Pending Submissions Project
	Personnel Electronic Records Access Project (ERA)
	National Routing System (NRS)
Boards	
Alberta Mental Health Board	Provincial Family Violence Treatment Program
Dr. Bruce Taylor/Workers' Compensation Board	Participation in the Workers' Compensation Board Electronic Reporting and Invoicing System
College	
Banff Centre for Continuing Education	Installation of CCTV Cameras at the Banff Centre
Officers of the Legislature	
Office of the Ethics Commissioner	Lobbyists Registry
Municipalities	
City of Calgary	CCTV Pilot Project
Strathcona County	Electronic Patient Care Reporting System (EPCR)
Regional Health Authorities	
Calgary Health Region	Blue 360
	Amendment to Privacy Assessment, HRMS Peoplesoft
	E-People
Capital Health	Iron Mountain Off-Site Storage
Chinook Health	Submission of Records of Employment (ROE) via Service Canada's ROE Web Privacy Impact Assessment
David Thompson Health Region	Regional Video Surveillance
East Central Health	Family Violence Screening
Northern Lights Health Region	Waste Stream Collection System - Confidential Information
Universities	
Athabasca University	HRSmart
	Athabasca University Contract Tracking System
Custodian	
Regional Health Authorities (RHA)	
Aspen Regional Health	Addendum to PACS - Mobile Magnetic Resonance Imaging (MMRI)
	Addendum to Aspen's PACS
	Children's Rural Mental Health Wait Time
Calgary Health Region	Alberta Perinatal Health Program
	Community Care Information System (CCIS) - Phase 2c - Amendment
	Organizational Privacy Management - update 2008 - Amendment
	Calgary Health Link Call Recording and Monitoring Implementation Project
	Medical Access
	Breast Health Wait Time Management Program
	Chronic Disease Management Information System (CDMIS) Phase 2C
	Positron CAD (Computer Aided Dispatch)
	Primary Care Network - Foothills Family Medical Centre Primary Care Collaborative Project
	MediScribe
	SmarTrack - Module Addition to the Operating Room Information System (ORIS) Application
	Mosaic Primary Care Network
	Amendment to Privacy Assessment - REPAC

APPENDIX D: ACCEPTED PRIVACY IMPACT ASSESSMENTS BY PUBLIC BODY & CUSTODIAN TYPE : 2008 - 2009

PUBLIC BODY	PIA TITLE
Calgary Health Region (con't)	South Calgary Primary Care Network - Organizational Management Amendment
	Mental Health Program
	Bow Valley Primary Care Network Chronic Disease Management and Prevention Program
	Bow Valley Primary Care Network
	Perinatal Online Registration Program (PORP)
	Amendment (PACS) - Picture Archiving and Communication System
	WesternCanadian Children's Heart Network
Capital Health	Amendment #1 Chronic Disease Management - PCN Joint Project Implementation of Patient Profile Viewer and Population Dashboard
	Open EMB Pilot Program
	Alberta Perinatal Health Program
	St. Albert and Sturgeon Primary Care Network - PHARMFILE
	Amendment #2 to the Operative Services Information System (OSIS)
	Iron Mountain Off-Site Storage
	Histotrac Laboratory Information System
	Home Parenteral Therapy Smart Infusion Pumps
	Regional ECG Data Management System
	ARTSSN (Alberta Real Time Syndromic Surveillance Net)
	Acute Care of the Elderly (ACE) Unit Outcomes Database
	MetaHealth PowerMonitor Plus and PowerSign Implementation Amendment
	Alberta Cardiac Access Collaboration Evaluation
	Capital Health Link Remote Agents
	In Vitro Fertilization Clinic
	Sound Processor Program for Cochlear Americas Cochlear Implant Patients
	Westview Primary Care Nework - After-hours Clinic (Spruce Grove) and EMR Implementation
	Westview Primary Care Network Organizational Privacy Management - Amendment
	Regional Stroke Program Patient Database
	Continuing Care Systems Project (CCSP) Implementation of MDS RAI 2.0 in Continuing Care Centres
	Clinical Information System (CIS) Medication Management Pharmacy System Project
Chinook Health Region	FormFast Implementation Project
	APPROACH 'Heart Alert' Initiative
	Children's CARE Services' Grow Along with Me
	Clincial Telehealth - Addendum 1
	Automated Telephone Reminder Recall (ATR) Project
East Central Health	PRISM - Pediatric Regional Integrated Service Model
	PACS - Picture Archival and Communication System
	Family Violence Screening
	Health Weights Initiative - BMI Database
	Surgical Audit Database
	Measureable Assessment in Recreation for Resident - Centered Care (MARRCC)
Northern Lights Health Region	Waste Stream Collection System - Confidential Information
Palliser Health Region	Picture Archival and Communication System (PACS)
Peace Country Health	CBORD/Meditech Interface
	Patient Event Notification for Physicians
Physicians	
Dr. F.J. Ollewagen	Mainstreet Medical Services Clinic Part A Organizational
Dr. Marius Conradie, Dr. Kim Derouin	Amendment of PIA Part A
Dr. Louis van Wyk, Dr. Stephanus J. van Vuuren & Dr. Abdul Satar	Physician Office System Program (POSP)
Dr. Jim Hansen	Physician Office System Program (POSP)
Dr. Conrad Schulte	Physician Office System Program (POSP)
Dr. A. J. Smith, Dr. R. J. Botes & Dr. A. C. Gigg	Physician Office System Program (POSP)
Dr. Colin Safranovich, Dr. G.R. Blais, Dr. G. Ahmed & Dr. J. Corrigan	Physician Office System Program (POSP)
Dr. Sonya Varma	Physician Office System Program (POSP)
Dr. Gene S. Vitug	Physician Office System Program (POSP)
Dr. George Patocka, Dr. Eva Patocka, Dr. Krzysztof Wieczorek, Dr. Shmuel Yablonsky & Dr. Anatoly Doborousin	Physician Office System Program (POSP)
	Wireless Networking
Dr. Nadine Lundgren, Dr. Nicola Chappell & Dr. Susan Sutton	Physician Office System Program (POSP)

APPENDIX D: ACCEPTED PRIVACY IMPACT ASSESSMENTS BY PUBLIC BODY & CUSTODIAN TYPE : 2008 - 2009

PUBLIC BODY	PIA TITLE
Dr. Minesh Singh, Dr. D Reddy, Dr. Kostic and Dr. Naidoo	Physician Office System Program (POSP)
Dr. Jim Hansen, Dr. Frank Spence, Dr. D. Meldrum, Dr. R. Lesoway, Dr. Prieur, Dr. Filipchuk, Dr. Ma, Dr. Giannaccaro, Dr. K. Stone, Dr. M. Cohen, Dr. S. Aggarwal, Dr. T. Boyne, Dr. Danijamali, Dr. Basic, Dr. Kanani, Dr. Peters	Physician Office System Program (POSP)
Dr. G. E. (John) Coppola	Physician Office System Program (POSP)
	Wireless PIA
Dr. John I. Stanina	Physician Office System Program (POSP)
Dr. Lynne H. Robertson	Physician Office System Program (POSP)
Dr. Stanley Muwonge	Physician Office System Program (POSP)
Dr. Stewart Adams, Dr. Derek Woolner & Dr. Sharon Hackett	Physician Office System Program (POSP)
	Outsourced Transcription Services
Dr. David Strydom, Dr. Selby Frank, Dr. Willem Labuschange & Dr. Helen Frank	Physician Office System Program (POSP)
Dr. Marlene Lidkea, Dr. Krista Bennett, Dr. Brian C. Hayden & Dr. Connie Poon	Physician Office System Program (POSP)
Dr. Louis van Wyk	Physician Office System Program (POSP)
Dr. Imran Pirwany	Physician Office System Program (POSP)
Dr. Shaun Butcher	Physician Office System Program (POSP)
Dr. Raghmeet S. Basati	Physician Office System Program (POSP)
Dr. Ashref Jeeva	Physician Office System Program (POSP)
Dr Robert Collingridge	Physician Office System Program (POSP)
Dr. Margaret Churcher	Physician Office System Program (POSP)
	Wireless Access to CLinic EMR
Dr. J Malach	Physician Office System Program (POSP)
	Wireless Network Access to Clinic EMR
Dr. Michael J. Hobart	Physician Office System Program (POSP)
Dr. Narpinder Hans, Dr. Satvir Gill, Dr. Richard Hanelt, Dr. Kalyani Chung	Physician Office System Program (POSP)
Dr. Timothy Dowdall, Dr. Jaques Branch, Dr. Valerie Congdon, Dr. Noel Grisdale, Dr. Douglas Higgin, Dr. Pollie Lumby, Dr. Gary Ray, Dr. Matthew Schuk & Dr. Brian Siray	Physician Office System Program (POSP)
Dr. E. Andrews, Dr. C. Cheslock, Dr. S. Dube, Dr. M. F. Kirwan, Dr. C. E. Lewis, Dr. C. Lyddell & Dr. B. K. Norris	Physician Office System Program (POSP)
Dr. G.F. MacDonald	Physician Office System Program (POSP)
Dr. Samir Mouhammed & Dr. Sahar Moussa	Physician Office System Program (POSP)
Dr. Jeannete Soriano & Dr. Matt van Olm	Physician Office System Program (POSP)
Dr. Wayne Chang, Dr. Eliza Barnard, Dr. Karan Glendinning, Dr. Brad Davies, Dr. Matt Ginzer, Dr. Mary Ellen James, Dr. Philippa Keegan, Dr. Marilyn Kish, Dr. Jana Krabich, Dr. Mike Lee, Dr. Brian Pedersen, Dr. Vicki Penney, Dr. Christo Rabie, Dr. Ross Rigby & Dr. Angela Wooller	Physician Office System Program (POSP)
Dr. Kristen I. Westberg	Physician Office System Program (POSP)
Dr. Ernst Greyvenstein, Dr. Cynthia Landy, Dr. Melanie Hnatiuk & Dr. Glenda McLean	Physician Office System Program (POSP)
Dr. Andrew Wong	Physician Office System Program (POSP)
Dr. E. Magerman & Dr. Adil Siddiqui	Physician Office System Program (POSP)
Dr. Joseph M. Carson & Dr. Mindy Gautama	Physician Office System Program (POSP)
	Wireless Access to Clinic EMR
Dr. Yetunde Kasumu, Dr. Christopher Musah, Dr. Hani Ayad, Dr. Trevor Bernhardt, Dr. Estelle Roos, Dr. Fadhil Ali	Physician Office System Program (POSP)
	e-injury Reporting to WCB via EMR
Dr. Joseph Oyeyemi	Physician Office System Program (POSP)
Dr. Olukayode Fawole	Physician Office System Program (POSP)
	Wireless Access to Clinic EMR
Dr. Mbongani Kabila	Physician Office System Program (POSP)
Dr. Bernard Nwaka	Physician Office System Program (POSP)
Dr. Mobina Chaudhry	Physician Office System Program (POSP)
Dr. Justin C. Sebastian	Physician Office System Program (POSP)
	Outsourced Transcription Services
Dr. Beverly V. Britz	Physician Office System Program (POSP)
Dr. Patricia E. Stansberry	Physician Office System Program (POSP)
Dr. Mark G. Hawkins, Dr. Alex Brothers, Dr. Gert Du Plessis, Dr. Catherine Hinds, Dr. Deb Meronek, Dr. John Michalyshyn and Dr. Mike Quinlan	Physician Office System Program (POSP)
Dr. Alan Stuart Guest	Physician Office System Program (POSP)
Dr. Steven Bunn	Physician Office System Program (POSP)
Dr. Dalton E. Sholter	Physician Office System Program (POSP)
Dr. H. Niall Jones	Physician Office System Program (POSP)
Dr. Alexander Yan	Physician Office System Program (POSP)

APPENDIX D: ACCEPTED PRIVACY IMPACT ASSESSMENTS BY PUBLIC BODY & CUSTODIAN TYPE : 2008 - 2009

PUBLIC BODY	PIA TITLE
Dr. Franciscus van Netten	Physician Office System Program (POSP)
Dr. John Koller	Physician Office System Program (POSP)
Dr. Young William Phiri	Physician Office System Program (POSP)
Dr. Eric Schloss	Physician Office System Program (POSP)
Dr. Johannes C. Bouwer	Physician Office System Program (POSP)
Dr. Ross Harrison, Dr. Terry Stewart, Dr. Caroline Bain & Dr. Conway Brewerton	Physician Office System Program (POSP)
Dr. Noordni Virani & Dr. Samina Mahfuz Rahman	Physician Office System Program (POSP)
Dr. Robert Cole	Physician Office System Program (POSP)
	Outsourced Transcription Services
Dr. Vincent Mannion	Physician Office System Program (POSP)
Dr. Catherine A. Hansen	Physician Office System Program (POSP)
Dr. Maria E. Muller	Physician Office System Program (POSP)
Dr. John S. J. Bradley, Dr. Shelley Lynn Duggan & Dr. Sabin Shurraw	Physician Office System Program (POSP)
Dr. John E. Holland & Dr. Ilona Levin	Physician Office System Program (POSP)
Dr. K. Fathimani	Physician Office System Program (POSP)
Dr. Brennan M. Walters	Physician Office System Program (POSP)
Dr. Ross Harrison, Dr. Terry Stewart, Dr. Caroline Bain & Dr. Conway Brewerton	Physician Office System Program (POSP)
Dr. Noordni Virani & Dr. Samina Mahfuz Rahman	Physician Office System Program (POSP)
Dr. J.F. Erasmus	Physician Office System Program (POSP)
Dr. Rozemin Devraj-Kizuk	Physician Office System Program (POSP)
Dr. Rupinder K. Toor Mangat, Dr. Sheila Lakhoo, Dr. Yasmin Majeed & Dr. Aminder Shergill	Alberta Netcare Portal
Dr. Bruce Taylor	Alberta Netcare Portal
	Tranmission of Images to the DI Central Repository (includes conversion to new PACS compatible EMR/RIS)
	Wireless Access to Internet
Dr. Bobby Sreenivasan	Alberta Netcare Portal
Dr. Janet Chiu & Dr. Peter Hum	Alberta Netcare Portal
Dr. Raeleen D. Cherry	Alberta Netcare Portal
Dr. Gregory J. Skinner	Alberta Netcare Portal
Dr. James E. Bell	Alberta Netcare Portal
Dr. Jusli P. Jeh	Alberta Netcare Portal
Dr. Gerald L. Moysa	Alberta Netcare Portal
Dr. Orest Bykowski	Alberta Netcare Portal
Dr. Allan Chiu, Dr. Don Korzenowski, Dr. Dena Stockburger, Dr. Harry Zirk, Dr. Jean Langley	Alberta Netcare Portal
Dr. Peter L. Chiu	Alberta Netcare Portal
Dr. Benjamin Toane	Alberta Netcare Portal
Dr. M.A.R. Sayeed, Dr. K. Govender, Dr. N. Rattan, Dr. V. Naidoo & Dr. S. Lowton	Alberta Netcare Portal
Dr. Donald D. Meier	Alberta Netcare Portal
Dr. Bohdan Marynowski	Alberta Netcare Portal
Dr. Nand Goel	Alberta Netcare Portal
Dr. A.H. McKenzie	Alberta Netcare Portal
Dr. Stephen J. Morys	Alberta Netcare Portal
	Wireless Implementation and WCB e-Injury Reporting
Dr. Joseph C. Sendziak	Alberta Netcare Portal
Dr. Johannes Botha	Alberta Netcare Portal
Dr. Sonnie E. Oyama	Alberta Netcare Portal
Dr. Morley Kutzner	Alberta Netcare Portal
Dr. John McIvor, Dr. James McMillan & Dr. Joseph Berman	Alberta Netcare Portal
Dr. Vincent Mannion	Alberta Netcare Portal
Dr. Donald Mercereau, Dr. Colin Noble, Dr. Scott Paterson, Dr. Kevin Lung, Dr. Walter Dobrovolsky, Dr. Stan Olson, Dr. Brent Bucyk, Dr. Jeff Charlton, Dr. Christopher Robinson & Dr. Terence Vankka	Alberta Netcare Portal
Dr. Donna Cave, Dr. Nancy Cheng, Dr. Lorraine Durand, Dr. Gordon McInroy & Dr. Mihiri Wanigaratne	e-Injury Reporting to WCB via EMR
Dr. David J. Piesas, Dr. Jared Van Bussel, Dr. Melvyn Lavalle, Dr. Herbert Odi Onwudiwe & Dr. Emily Muller	Part A - Calgary Rural Primary Care Network
Dr. Brian Page & Dr. Heather Brake	Part A - Calgary Rural Primary Care Network
Dr. R. Flayne Byam & Dr. Richard J. Ansell	Part A - Calgary Rural Primary Care Network
Dr. Ron Gorsche, Dr. Kevin Bozyk, Dr. Sara Makhdoom, Dr. Chris Powell, Dr. Keith Spackman & Dr. Stephen Finnegan	Part A - Calgary Rural Primary Care Network
Dr. Robert Wickson, Dr. Lori Ann Lobay & Dr. Jonie McNeely	Part A - Calgary Rural Primary Care Network

APPENDIX D: ACCEPTED PRIVACY IMPACT ASSESSMENTS BY PUBLIC BODY & CUSTODIAN TYPE : 2008 - 2009

PUBLIC BODY	PIA TITLE
Dr. Lesley Coulter	Wireless Access to Clinic EMR
Dr. Leslie Preston, Dr. Miriam A. Siderson, Dr. Brenda L. Wollin & Dr. Kathleen Baergen	Wireless Access to Clinic EMR
Dr. Andrew Jackson	Outsourced Transcription Services
	Outsourced Billing Services
Dr. Tobias Gelber	Implementation of Remote Data Back-up System and Electronic Lab Reporting
Dr. Benjamin Wong	CDC Patient Imaging Systems (PACS & RIS)
Dr. Norman Yee	mydoctor.ca Health Portal
Dr. Benjamin Chiam	Medical Record Implementation Project
Provincial Boards	
Alberta Cancer Board	Telehealth
	Centricity Pharmacy
	Alberta Colorectral Cancer Screening Program - Amendment
Alberta Mental Health Board	Provincial Family Violence Treatment Program
Ministry	
Alberta Health & Wellness	Newborn Metabolic Screening System - Addendum
	Fourth Addendum to the Pharmaceutical Information Network
	Business Intelligence Environment (BIE) - Amendment
	Clinical Stabilization Initiative (CSI) Rural Remote and Noorthern Program (RRNP) and Communities in Crisi (CIC) Retroactive Payment
	First Addendum to AB Netcare Electronic Heqalth Record Provincial Client Registry (PCR)
	TB Case Management Privacy Impact Assessment - First Addendum
	Alberta Continuing Care Information System - Addendum
	First Nations and Inuit Health Branch
	Long Term Care Facilities Funding Methodology (LTC FFM) Project
Subsidiary Health Corporation	
Regional Shared Health Information (RSHIP)	Regional Shared Health Information Progarm Phase 1 Meditech Application
	Care Manager - Home Care Module (CMHC) Meditech
	Operating Room Manager Module of Meditech
	Emergency Department Manager
	Electronic Claims - Reciprocal Billing module of Meditech
	Quality Managment/Risk Management
	Nutrition and Food Services (NFS) Systems (CBORD & Computrition) /Meditech Interface
	Addendum to the RSHIP Phase 1 PIA Use of ULI in e-mail
	Patient Care System
St. Joseph's General Hospital	Alberta Provincial Stroke Strategy
Pharmacies/Pharmacists	
Medicine Shoppe Pharmacy #212	Alberta Netcare Portal
Raymond Pharmacy	Alberta Netcare Portal
Skelton's Pharmacy	Alberta Netcare Portal
Mackenzie Drugs	Alberta Netcare Portal
Gail's Apothecary and Compounding Pharmacy	Alberta Netcare Portal
Magrath Pharmacy	Alberta Netcare Portal
Stokes Dispensary	Alberta Netcare Portal
The Picture Butte Pharmacy	Alberta Netcare Portal
Prescription Centre West	Alberta Netcare Portal
Andersons Pharmacy	Alberta Netcare Portal
Good Health Dispensary	Alberta Netcare Portal
Stafford Pharmacy Home Health Centre	Alberta Netcare Portal
Charesholm Pharmacy	Alberta Netcare Portal
Norbridge Pharmacy	Alberta Netcare Portal
Draffin's Pharmasave #365 and 369	Alberta Netcare Portal
Fort Pharmacy	Alberta Netcare Portal
Tkachenko Pharmacy	Alberta Netcare Portal
Coaldale Pharmacy	Alberta Netcare Portal
Houles Pharmacy Ltd.	Alberta Netcare Portal
Strathcona Prescription Centre	Alberta Netcare Portal
The Medicine Shoppe Pharmacy #251	Alberta Netcare Portal
Thorhild Drug Store	Alberta Netcare Portal
Becher Pharmacy Ltd.	Alberta Netcare Portal
Fournier Drugs Limited	Alberta Netcare Portal

PUBLIC BODY	PIA TITLE
Berwyn Pharmacy Ltd.	Alberta Netcare Portal
Paragon Pharmacies/Super Drug Mart	Alberta Netcare Portal
Super Drug Mart Stadium/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Strathmore/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Airdrie/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Midniter/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Lakeview/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Cochrane/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Crowfoot/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Tucker/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Westbrook/Paragon Pharmacies	Alberta Netcare Portal
Super Drug Mart Riverbend/Paragon Pharmacies	Alberta Netcare Portal
Beaverlodge Drug Ltd.	Alberta Netcare Portal
Medicine Shoppe #189	Alberta Netcare Portal
Boylan Pharmasave #315	Alberta Netcare Portal
Pharmasave 303	Alberta Netcare Portal
Balkwill Pharmacy Ltd.	Alberta Netcare Portal
Pharmasave 358	Alberta Netcare Portal
Westpark Drugs	Alberta Netcare Portal
Reverdi Pharmacy Ltd. O/A Guardian Drugs	Alberta Netcare Portal
The Medicine Shoppe #266	Alberta Netcare Portal
Fairview Value Drug Mart	Alberta Netcare Portal
Sproules Mountainview IDA	Alberta Netcare Portal
High Level Value Drugs	Alberta Netcare Portal
Manning Value Drug Mart	Alberta Netcare Portal
Grimshaw Value Drug Mart	Alberta Netcare Portal
La Crete Apple Drugs	Alberta Netcare Portal
Shamrock Pharmacy	Alberta Netcare Portal
Pioneer Drugs	Alberta Netcare Portal
Pioneer Drugs	Alberta Netcare Portal
Falher IDA Pharmacy	Alberta Netcare Portal
McLennan IDA Pharmacy	Alberta Netcare Portal
Oyen Value Drug Mart	Alberta Netcare Portal
Bow Island Apple Drugs	Alberta Netcare Portal
Extended Care Pharmacy	Alberta Netcare Portal
Spirit River Drug 1980 Ltd.	Alberta Netcare Portal
The Medicine Shoppe 129	Alberta Netcare Portal
Signature Medicine Centre Pharmacy	Alberta Netcare Portal
Hall's Pharmacy	Alberta Netcare Portal
Waldins Pharmacy Ltd.	Alberta Netcare Portal
Medicine Shoppe #111	Alberta Netcare Portal
Valley IDA Pharmacy	Alberta Netcare Portal
Market Mall Medicine Centre Pharmacy	Alberta Netcare Portal
Didsbury Pharmasave	Alberta Netcare Portal
Hinton IDA Pharmacy	Alberta Netcare Portal
Wetaskiwin Value Drug Mart	Alberta Netcare Portal
	WAN Project
Penneys Drug Mart	Alberta Netcare Portal
Michener Services Pharmacy	Alberta Netcare Portal
The Medicine Shoppe Pharmacy #260	Alberta Netcare Portal
Gourlay's Clinic Pharmacy	Alberta Netcare Portal
Medicine Shoppe #158	Alberta Netcare Portal
Tower Drugs	Alberta Netcare Portal
Holy Cross Medicine Centre Pharmacy	Alberta Netcare Portal
Wright Pharmacy Ltd.	Alberta Netcare Portal
Fifth Avenue Drugs - IDA #1780	Alberta Netcare Portal
Salvus Pharmacy	Alberta Netcare Portal
The Medicine Shoppe #242	Alberta Netcare Portal
Barrhead District Coop Pharmacy	Alberta Netcare Portal

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PUBLIC BODY	PIA TITLE
Sherwood Dispensaries & Homecare	Alberta Netcare Portal
Shoppers Drug Mart - Brown's General Store Ltd.	Alberta Netcare Portal
Shoppers Drug Mart #353, Kalyn Holdings Inc.	Alberta Netcare Portal
The Corner Drugstore - #381	Alberta Netcare Portal
The Medicine Shoppe #178	Alberta Netcare Portal
Shoppers Drug Mart #308, Jowsey Pharmacy Ltd.	Alberta Netcare Portal
Sarcee IDA Pharmacy	Alberta Netcare Portal
Cambrian Pharmacy	Alberta Netcare Portal
Shoppers Drug Mart #2413	Alberta Netcare Portal
Medicine Shoppe #199	Alberta Netcare Portal
Zinoha Pharmacy Ltd.	Alberta Netcare Portal
Script Pharmacy	Alberta Netcare Portal
Future Drug Mart	Alberta Netcare Portal
Blain MacLean Pharmacy	Alberta Netcare Portal
Clareview Drug Mart	Alberta Netcare Portal
Philmar Pharmacy Ltd.	Alberta Netcare Portal
Martindale Pharmacy	Alberta Netcare Portal
First Choice Pharmacy	Alberta Netcare Portal
Richmond Square Pharmacy	Alberta Netcare Portal
Alberta Beach Community Drugs Inc.	Alberta Netcare Portal
Sangudo Central County Pharmacy Ltd.	Alberta Netcare Portal
Onoway Health Care Pharmacy Ltd.	Alberta Netcare Portal
Switzer's Drugs	Alberta Netcare Portal
Shoppers Drug Mart 309	Alberta Netcare Portal
Shoppers Drug Mart #389-Gill Pharmacy Services Ltd.	Alberta Netcare Portal
Edmonton Remand Centre Pharmacy	Alberta Netcare Portal
Edmonton Remand Centre Pharmacy	ERC Pharmacy Software Application
Health Select Pharmacy	Alberta Pharmacy Practice Models Initiative (PPMI)
Value Drug Mart	Dispensary System Implementation Project
Long Term Care Facilities	
Linden Nursing Home	Linden Nursing Home Electronic Health Record and MDS 2.0 Implementation
Edmonton Chinatown Care Centre	Continuing Care System Project MDS/Capital Health
St. Michael's HealthCare Services	Continuing Care System Project MDS/Capital Health
The Salem Manor Society	Continuing Care System Project MDS/Capital Health
St. Joseph's Auxiliary Hospital	Continuing Care System Project MDS/Capital Health
Hardisty Nursing Home	Continuing Care System Project MDS/Capital Health
Qualicare Health Services Corporation	Continuing Care System Project MDS/Capital Health
Venta Care Centre	Continuing Care System Project MDS/Capital Health
Touchmark at Wedgewood	Continuing Care System Project MDS/Capital Health
Lamont Health Care Centre	Review of Part A
Forest Grove Care Centre Ltd.	PointClinikCare
Killam Health Care Centre	MediTech Patient Care System Module (PCS)*
The Bethany Group	Alberta Provincial Stroke Strategy
Carewest	Carewest Operational Stress Injury (OSI) Clinic Telehealth Outreach Project
Bethany Care Society	Citrix Project
St. Michael's Health Centre	St. Michael's Health Centre Organizational Privacy Management
	Collection and submission of inpatient rehabilitation data via the PCS NRS Module to CIHI
	Collection and submission of minimal Data Set, using RAI 2.0, to Alberta Health and Wellness via CIHI
	Alberta Netcare
Covenant Health	Digital Recording of Patient Therapy Sessions
Custodians Pursuant to the Regulations	
Faculty of Medicine - University of Calgary	MediScribe
Jonoke Software Development Inc.	Jonoke's ASP Implementation
Health Quality Council of Alberta	Quality Reporting Initiative - Collection and Data Matching
Organization	
Medical Clinic	
Dr. Jennifer Tse & Dr. Jon M. Adamis	Clinic Surveillance Cameras

Privacy Impact Assessments are mandatory under the *Health Information Act* (HIA), they are not required under the *Freedom of Information and Protection of Privacy Act* (FOIP), or the *Personal Information Protection Act* (PIPA).

For additional information regarding the above listed PIAs, please refer to the OIPC webpage at **www.OIPC.ab.ca.**

Office of the
Information and Privacy
Commissioner of Alberta

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